

IRAN'S ISLAMIC REVOLUTIONARY GUARD CORPS: FUELING MIDDLE EAST TURMOIL

HEARING BEFORE THE COMMITTEE ON FOREIGN AFFAIRS HOUSE OF REPRESENTATIVES ONE HUNDRED FOURTEENTH CONGRESS FIRST SESSION

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IRAN'S ISLAMIC REVOLUTIONARY GUARD CORPS: FUELING MIDDLE EAST TURMOIL

WEDNESDAY, DECEMBER 2, 2015

HOUSE OF REPRESENTATIVES,
COMMITTEE ON FOREIGN AFFAIRS,
Washington, DC.

The committee met, pursuant to notice, at 10:09 a.m. in room 2172, Rayburn House Office Building, Hon. Edward Royce (chairman of the committee) presiding.

Chairman ROYCE. This hearing will come to order. Iran and its Islamic Revolutionary Guard Corps have really been on a roll, and that is the subject of this hearing today. And I want to thank our witnesses for being with us.

Let me start by just giving my observations on recent events. So over the last few weeks, the IRGC has tested a new long-range ballistic missile, and that test is in violation of the U.N. sanctions. They also released a video of dozens more of these ICBMs staged in an underground bunker. The IRGC Quds Force has stepped up efforts in support of the murderous Assad regime in Syria, and we have seen those attacks on the ground. And by all accounts it appears that the IRGC has prevented international investigators from assessing the information needed to conclusively finish a report on the possible military dimensions of Iran's nuclear program. It is on IRGC territory, so.

From nuclear proliferation to support of international terrorism, to human rights abuses, the IRGC has made Iran the global menace that Iran is today. The IRGC is responsible for squashing democracy movements at home, for spreading the Iranian regime's revolutionary ideology abroad, and for sparking turmoil throughout the Middle East. Its forces operate again, independent of Iran's regular army. It answers directly only to one man, Iran's Supreme Leader.

While most understand the role of the IRGC in fueling conflict throughout the region, its hidden grasp on the Iranian economy is just as important. People don't realize that most of the major businesses were nationalized basically and turned over to the IRGC to control. So they have about 30 percent of the Iranian economy. The IRGC has been labeled Iran's "most powerful economic actor" by the U.S. Treasury Department, which has noted its deep reach into "critical sectors of Iran's economic infrastructure." The IRGC's biggest, largest entity is this construction arm which controls 800 affiliated companies. That it also controls billions of assets, is often I think lost, on the public here. The fact that much of the money

that is held in escrow that when released is going to flow through the IRGC, I think that point has been lost on us. These activities in turn fund Iran's ballistic missile program, its military activities, its regional aggression.

Of course none of this appears to disqualify Iran from receiving sanctions relief under a nuclear deal that allows Iran to keep a path to a weapon. Within months Iran could have access to tens of billions in new cash as this money comes out of escrow. And this, what I call a "stimulus package," this stimulus package for the Supreme Leader will only strengthen the IRGC. And as trade restrictions with Iran loosens, that in turn of course, will increase its access to dual-use technology for its military and its missile programs.

An IRGC with more cash means more threats to the United States and our allies. Even when Iran's sanctions were fully in place, Iran's support to the Assad regime in Syria totaled every year \$6 billion. I am going to guess now that that is going to go up. IRGC support on the ground, combined with Russian air support, worsened the already horrible conflict in Syria, drawing in foreign fighters and giving ISIS room to grow.

And more resources for the IRGC also promises to create problems in Iraq, and in Yemen—where the guards are backing Shia militias responsible for violence against Iraq's Sunni minority and against the Houthi rebels fighting Saudi forces in Yemen. This combined with Iran's continued support for terrorist groups such as Hezbollah and Hamas—and I will just remind people that the other story that surfaced a few months ago, was that the IRGC will now try to transfer—and I think this is in direct violation of the agreement—try to transfer guidance systems, GPS guidance systems, to the 90,000 rockets and missiles that are already in Hezbollah's inventory, and has also offered to resupply the inventory that Hamas spent in the Gaza war and rebuild the tunnels to boot. So, the major source of instability in that region is the IRGC.

In selling its flawed nuclear deal to Congress, I believe Secretary Kerry testified, that there would be no let up on Iran's terror and destructive regional behavior. That was my takeaway as I listened to his words, but I want to now understand how that is going to be followed with action. We have yet to see any effective strategy from the administration to pushback against IRGC's regional advances which have emboldened Iran, which have undermined our allies, and this morning we will hear from our witnesses on what such a strategy might look like, and how Congress can help.

And I will now turn to the ranking member for any opening comments he may have. Mr. Engel.

Mr. ENGEL. Thank you, Mr. Chairman. Thank you for calling this hearing, and I want to welcome all witnesses to the Foreign Affairs Committee. In the wake of the Paris attacks, the world is focused on the fight against ISIS, and announcements yesterday by the Secretary of Defense, about new measures that we are taking to fight ISIS are welcome, and I think that there is obviously a lot more to go.

We are reminded of the ongoing threat posed by terrorism, and so I am glad our committee is focusing on the world's leading state sponsor of terrorism, Iran. I want to echo the concerns the chair-

man just mentioned, the fact that Iran is the leading state sponsor of terrorism. And in the past several years when Iran had no money, it still found money to be the leading state sponsor of terrorism.

Under the deal negotiated with Iran, they will be awash in cash. They will have lots of money, and imagine how much destruction they can do in support of terrorist activities and terrorism. That is very deeply troubling to me, and it was and has been throughout our discussions about U.S. relations with Iran and the entire nuclear deal with Iran.

Now, since ceding power in 1979, the Iranian regime has built an ugly record supporting terrorist proxies. Let's remember this: The seizure of our Embassy in Tehran 1979, the bombings of our Embassy in the Marines barracks in Beirut in the early 1980s, killing nearly 300 Americans, the attacks in Buenos Aires that targeted Israel's Embassy and a Jewish community center, the Khobar Towers bombing in Saudi Arabia, which also cost American lives, and just a few years ago, a plot to assassinate the Saudi Ambassador right here in Washington. And every one of these horrible events is covered in Iran's fingerprints.

The Iranian regime uses the Quds Force, an elite unit of the Islamic Revolutionary Guard Corps, as a tool to support terrorist proxies and spread instability throughout the region. And in recent years, Iran's leaders have doubled down on this reprehensible policy, and let's just look at what is going on today. In Syria, Iran is committed to propping up the Assad regime and now is working with Putin in pursuit of that objective. So much for P5+1. It has mobilized Hezbollah and organized militias composed of Shi'ite fighters from Iraq, Afghanistan, and Pakistan to support the regime. It has also deployed hundreds if not thousands of the Quds Force fighters in a direct combat roll. And the result of Iran's actions, a longer, more costly war, a graver humanitarian crisis, and more and more innocent lives lost.

In Iraq, the Quds Force continues to support hard-core Shia militias, some of which were involved in targeting American troops during the Iraq war. These violent groups drive sectarian division, making it harder to build the inclusive Iraqi Government necessary to help defeat ISIS. And in Yemen, Iran's support for Houthi rebels has fomented a bloody civil war that is now spilling over Yemen's borders. Chaos in that country has hampered U.S. counterterrorism efforts, focused on AQAP, one of the most dangerous Al Qaeda affiliates. Iran also supports Shi'ite elements in other Gulf states, including Bahrain and Saudi Arabia, that are involved in efforts to destabilize those governments. And, of course, the Iranian regime has repeatedly expressed its support for wiping Israel off the map. By providing a steady flow of missiles to Hezbollah and arms to Hamas, Iran is a grave threat to our close ally Israel.

Finally, it is important to note that Iran's support for terrorism is not just limited to the Middle East. Just this past week Kenyan security forces arrested two men suspected of working with the Quds Force to plan attacks in that East African nation. This dangerous pattern is one of the reasons I remain concerned about the Iran nuclear deal. Once the nuclear sanctions on Iran are lifted, the regime will have access to tens of billions of dollars in new

wealth, and I will bet my money that some of it will end up in terrorist coffers.

So I agree with what the chairman said: Iran was a leading and has been a leading state sponsor of terrorism when they had no money. Imagine now when they are going to have sanctions lifted, how much money they have which will directly go to terrorist activities. So in my view, these factors all point to the likelihood of greater case and instability in the years ahead. So today I hope we can discuss what can be done to counter Iran's maligned activities in the region beyond.

I want to mention just a few areas I think are most important. First, we must aggressively enforce terrorism, proliferation, and human rights sanctions on Iran. This includes existing sanctions on the IRGC, and we should continue to designate all entities connected to Iran's support for terrorism. We need to send a clear message that working with Iranian firms linked to the IRGC is risky business.

Next, we need to keep making our case to our EU allies and others that Hezbollah as an organization, not just its military wing, is a terrorist organization and should be treated like a terrorist organization. Our friends in Europe try to split hairs by saying that only part of Hamas is a terrorist organization. The other part is a humanitarian organization. Baloney. It is a terrorist organization, and we should say it, and our allies should say it.

We should ramp up our efforts to track the resources Iran receives as a result of sanctions relief. We need to know just how much money Iran is funneling to these violent groups. We need final closer cooperation with our Gulf allies on defense intelligence, counterterrorism, maritime security, and other key areas. And, lastly, we need to maintain a very close security relationship with Israel, our closest ally in the region. This includes the negotiation of a new memorandum of understanding, or MOU, that reflects the new security environment in the region.

We must also redouble our commitment to supporting missile defense systems, including Iron Dome, so that Israel is able to defend itself. And I hope going forward Congress and the administration do what is needed to pursue those aims. I look forward to ideas and insight from our witnesses, and I yield back.

Chairman ROYCE. Thank you, Mr. Engel. So this morning we are joined by a distinguished panel. We have Mr. Ali Alfoneh. He is a senior fellow at the Foundation for Defense of Democracies. He is an expert on civil military relations in Iran as well as the author of "Iran Unveiled: How the Revolutionary Guard is Transforming Iran from a Theocracy into a Military Dictatorship."

Mr. Scott Modell is managing director of the Rapidan Group, and prior to this he served at the Central Intelligence Agency where he conducted operations throughout the Middle East, including as part of the post-9/11 operations in Afghanistan.

And we have Ambassador Daniel Benjamin with us. He is the Norman E. McCulloch director at Dartmouth College. Previously Ambassador Benjamin served as the Ambassador-at-Large and Coordinator for Counterterrorism where he was the principal advisor on counterterrorism to Secretary of State Clinton.

And we welcome our panel. Without objection, the witnesses' full prepared statement will be made part of the record here. And members will have 5 days to submit statements or questions or any extraneous materials for the record. And Mr. Alfoneh, please summarize your remarks.

**STATEMENT OF MR. ALI ALFONEH, SENIOR FELLOW,
FOUNDATION FOR DEFENSE OF DEMOCRACIES**

Mr. ALFONEH. Good morning, Mr. Chairman, Ranking Member Engel. Thank you very much for your kind invitation, and thank you for providing me with the opportunity to share my analysis with you, along with the members of this distinguished panel.

You mentioned, sir, the Iranian revolution of 1979 as a historical event of the past, and that is, indeed, the American perception of the revolution. In Iran, however, the leaders of the Islamic Republic, they subscribe to Trotsky's theory of a permanent revolution. For them the revolution of 1979, is not a historical event of the past which took place and is over. From their perspective, the revolution is permanent, is happening every single day, and the engine of that revolution, Mr. Chairman, is the Islamic Revolutionary Guard Corps.

This is also why I do not share the optimism of some of my colleagues here in Washington who believe that the emergence of President Rouhani, his promise of engaging in bilateral talks with the U.S., the nuclear negotiations and the deal which was negotiated, and even emergence of a common threat of Islamic State, is going to make life easier in the Islamic Republic of Iran. Because of the very simple reason that President Rouhani and his technocratic government, they are not in charge of the portfolios which are of interest to us today. The Islamic Revolutionary Guards Corps is in control of Iran's regional policies.

Let's take a quick look at the problems that I see. First of all, as the chairman and the ranking member pointed out, the Revolutionary Guard not only is in control of the policy, they have also benefitted most financially from the nuclear deal. Much of the money which the Government of the Islamic Republic has received is going to be channeled to companies owned by the Revolutionary Guards, or directly to the military budget of the Revolutionary Guards. Apart from this, the Islamic Revolutionary Guard is pursuing policy objectives in the Middle East region which are in contrast and totally opposed to U.S. objectives.

The United States desires to see a future of Syria in which Bashar al-Assad, who is personally responsible for destruction of his own country, does not play a role. The Revolutionary Guard's goal is to keep Bashar al-Assad in power, and to that effect they are trying to mobilize, and they have managed to mobilize, a pan-Shi'ite international brigade to Syria, and that deployment of course is increasing the risk of spread of the conflict in Syria to other countries. The home countries of those militia men, which is primarily Lebanon, Iraq, Afghanistan, and even distant and geographically far away Pakistan.

The United States desires to fight ISIL. That is not the case with the Revolutionary Guards. From their perspective, it is fine that there is an enemy called the Islamic State. Which is not really

threatening the existence of the Islamic Republic of Iran, and at the same time, is the only alternative to Bashar al-Assad and his dictatorial regime in Syria. This is why we see that the Iranian forces and unfortunately also the Russian forces in Syria, are not targeting the ISIL threats. They are targeting the secular opposition to Mr. Assad.

We also see that these mechanisms are perpetuating the war in Syria. Because of the exact presence of the Revolutionary Guards in Syria, we see more and more Sunni radicals from all over the world travelling to Syria to fight the Shia threat, and to counter it, and this is, of course, something which is perpetuating the conflict and keeping ISIL, in its existence, it is prolonging the existence of ISIS.

So some of the policies which I believe the United States could apply in order to counter those measures is first and foremost to attack those units of the Revolutionary Guards which were deployed to Syria by designations. Those groups of the Revolutionary Guards, they are engaged in support to Mr. Assad's regime. They are engaged in terrorist activities, and they should be designated as such. And also I believe that the United States should never accept demands of the Islamic Republic of Iran or others that Mr. Bashar al-Assad should be kept in power in Syria because that would only serve the interests of the Revolutionary Guards. And will perpetuate not only the war in Syria, but also the revolution, the permanent revolution which I mentioned in the beginning of this presentation. Thank you, Mr. Chairman.

[The prepared statement of Mr. Alfoneh follows:]

Congressional Testimony

Iran and the IRGC *Fueling Conflict in the Middle East*

Ali Alfoneh
Senior Fellow
Foundation for Defense of Democracies

**Hearing before the
House Foreign Affairs Committee**

Washington, DC
December 2, 2015



1726 M Street NW • Suite 700 • Washington, DC 20036

Ali Alfoneh

December 2, 2015

Thank you Chairman Royce, Ranking Member Engel, and members of this committee for the opportunity to appear before you today.

Iran's regional goals remain inimical to U.S. national interests and the security of U.S. allies. The emergence of President Hassan Rouhani,¹ his promise of engaging in bilateral talks with the United States,² the nuclear agreement between the Islamic Republic of Iran and the P5+1,³ and the rise of the Islamic State have led some in the West to hope for a new alignment of strategic interests between Washington and Tehran.

To this end, Secretary of State John Kerry formally invited Foreign Minister Mohammad-Javad Zarif to participate in negotiations at the end of October in Vienna to resolve the war in Syria.⁴

President Rouhani and Foreign Minister Zarif, however, command little influence over the Islamic Republic's regional policies. The Islamic Revolutionary Guard Corps (IRGC) owns this portfolio,⁵ and beyond a fleeting tactical convergence of interests, the Revolutionary Guards and Washington do not have aligning strategic goals in Syria. Washington wants to resolve conflicts in the Middle East; the IRGC benefits most by seeing these conflicts continue.

According to the recent testimony of Ambassador Anne W. Patterson, assistant secretary of state for near eastern affairs, the United States is pursuing four objectives in Syria:

“(1) defeat ISIL [Islamic State of Iraq and the Levant] militarily in both Syria and Iraq; (2) develop a political transition that gives Syria a future without Bashar al-Asad; (3) ease the suffering of the Syrian people; and (4) stabilize our regional allies and help European partners as they cope with a massive refugee crisis.”⁶

¹ Zahra Hosseinian & Yeganeh Torbati, “Moderate Rohani Wins Iran Presidential Election in Landslide,” *Reuters*, June 15, 2013. (<http://in.reuters.com/article/2013/06/15/iran-election-results-hassan-rohani-idINDEE95E00U20130615>)

² “Rouhani dar Jam-e Daneshjouyan-e Daneshgah-e Sharif: Amrika Kadkhoda Ast, Ba Amrika Bebandim Rahat-tarim (Rouhani Amongst Sharif University Students: America is the Village Head, We Are Better Off Making a Deal with America),” *Mehr News Agency* (Iran), May 13, 2013. (<http://www.mehrnews.com/news/2054218/>) (امریکا کادخدو است، با آمریکا ببندیم راحت‌تریم)

³ Parisa Hafezi, Louis Charbonneau, John Irish, & Arshad Mohammed, “Iran Deal Reached, Obama Hails Step Towards ‘More Hopeful World,’” *Reuters*, July 15, 2015. (<http://in.reuters.com/article/2015/07/15/iran-nuclear-idINKCN0PO0IA20150715>)

⁴ “Iran to Be Invited to Next Round of Talks on Syria: U.S. Official,” *Reuters*, October 27, 2015. (<http://www.reuters.com/article/2015/10/27/us-mideast-crisis-syria-talks-idUSKCN0SL20H20151027#MkTU5de3yAVXV4Wc.97>)

⁵ “CENTCOM in 2010: Views from General David H. Petraeus,” *Institute for the Study of War*, January 22, 2010. (<http://www.understandingwar.org/prcss-media/webcast/ccntcom-2010-views-general-david-h-petraeus>)

⁶ Ambassador Anne W. Patterson, “U.S. Policy After Russia’s Escalation in Syria,” *Testimony before the House Committee on Foreign Affairs*, November 4, 2015. (<http://docs.house.gov/meetings/FA/FA00/20151104/104160/HHRG-114-FA00-Wstate-PattersonA-20151104.pdf>)

If one examines the public statements of the IRGC leadership and the activities of the IRGC in Syria, it's clear that the Islamic Republic is pursuing the exact opposite goals. For the Guards, the primary objectives are to: (1) keep Assad in power by deploying IRGC forces and non-Iranian Shiite militias in Syria; (2) highlight ISIL as a worse alternative to Assad while making no serious military effort against the Islamic State; and (3) concentrate Iran's military resources against Syrian rebel forces threatening the Assad regime, including the secular opposition, which might offer an acceptable alternative to Assad.

Major General Mohammad-Ali Jafari, the Corps' chief commander,⁷ and Major General Qassem Suleimani, head of the expeditionary Quds Force (IRGC-QF),⁸ have repeatedly expressed their support for Assad and his regime. Brigadier General Hossein Hamadani, the field commander of the Iranian forces in Syria who was killed in the suburbs of Aleppo on October 7,⁹ has not only praised Assad as "more obedient to the leader of the revolution [Ayatollah Ali Khamenei] than some of our statesmen," but also recalled the supreme leader stressing the importance of the "strategic depth" Syria provides to Iran.¹⁰

In Jafari's words, Hamadani's mission had been to "transfer experiences from the sedition of 2009" to Assad. That "sedition" is a reference to the Revolutionary Guards' suppression of the anti-government, pro-democracy rallies in Tehran in the wake of the fraudulent June 2009 presidential elections.¹¹ In that capacity, Hamadani not only reorganized Syrian paramilitary forces using Iran's Basij militia as a model,¹² but he also served as the most senior field commander in charge of IRGC units and non-Iranian Shiite militias deployed in Syria.

Iranian officials often deny their military involvement in Syria and insist that IRGC forces there are volunteers guarding Shiite pilgrimage sites in Damascus.¹³ Yet this

⁷ "Kasi Ra Be Ovan-e Jaygozin-e Assad Nemishenasim (We Do Not Know Any Alternative to Assad)," *Fars News Agency* (Iran), November 2, 2015. (<http://www.farsnews.com/13940811000880>)

⁸ "Sardar Suleimani dar Majles-e Khobregan: Ta Akhar az Souriyeh Hemayat Mikonim (Commander Suleimani at the Assembly of Experts: We will Support Syria to the End)," *Fars News Agency* (Iran), September 4, 2013. (<http://www.farsnews.com/newstext.php?nn=13920613000905>)

⁹ "Shahadat-e Sardar Sartip Pasdar Hossein Hamadani (Martyrdom of Brigadier General Hossein Hamadani)," *Sepah News* (Iran), October 9, 2015.

(<http://www.sepahnews.com/shownews.aspx?ID=8d6b1e99-ceec-4cf6-bdfc-1a3f9985d694>)

¹⁰ "Sardar Hamadani: Etaatpaziri-ye Bashar Assad az Rahbar-e Enghelab Bishtar az Barkhi Dowlatmardan-e Ma Ast (Commander Hamadani: Bashar Assad is More Obedient to the Leader of the Revolution than Some of Our Statesmen)," *Ghatreh News* (Iran), October 10, 2015.

(<http://www.ghatreh.com/news/nm27977760/>) (دولتمردان-ان-خو-چو-بیشتر-انقلاب-ز-هیر-ایست-بشار-بخیر-ی-اطاعت-میر-دار-همدانی)

¹¹ "Sardar Hamadani: Etaatpaziri-ye Bashar Assad az Rahbar-e Enghelab Bishtar az Barkhi Dowlatmardan-e Ma Ast (Commander Hamadani: Bashar Assad is More Obedient to the Leader of the Revolution than Some of Our Statesmen)," *Ghatreh News* (Iran), October 10, 2015.

(<http://www.ghatreh.com/news/nm27977760/>) (دولتمردان-ان-خو-چو-بیشتر-انقلاب-ز-هیر-ایست-بشار-بخیر-ی-اطاعت-میر-دار-همدانی)

¹² "Sarlashkar Jafari: 100 Hezar Nirou-ye Mardomi dar Souriyeh Sazemandehi Shodand (Major General Jafari: 100 Thousand Popular Forces Were Organized in Syria)," *Entekhab* (Iran), October 17, 2015. (<http://www.entekhab.ir/fa/news/230827>)

¹³ "Iran Hozour-e Nezami dar Souriyeh Nadarad (Iran Has No Military Presence in Syria)," *Tasnim News Agency* (Iran), October 16, 2015. (<http://www.tasnimnews.com/fa/news/1394/07/24/889637/>) (حضور-ایران-ندارد-دشمن-ی-نظامی)

author's survey of funeral services for Iranian, Afghan, and Pakistani Shiite fighters killed in the war (since the first recorded Iranian combat fatality in Syria in January 2012) provides proof of the Islamic Republic's military engagement. (See Addenda, Tables 1-3. Iraqi and Lebanese Shiite combat fatalities in Syria since the beginning of the war in Syria are not included in this survey.)

According to open-source data, 201 Iranian nationals, 178 Afghan nationals, and 33 Pakistani nationals—all Shiites, with the exception of two Iranian nationals—were killed in combat in Syria from January 2012 to November 30, 2015. (See Figure 1)

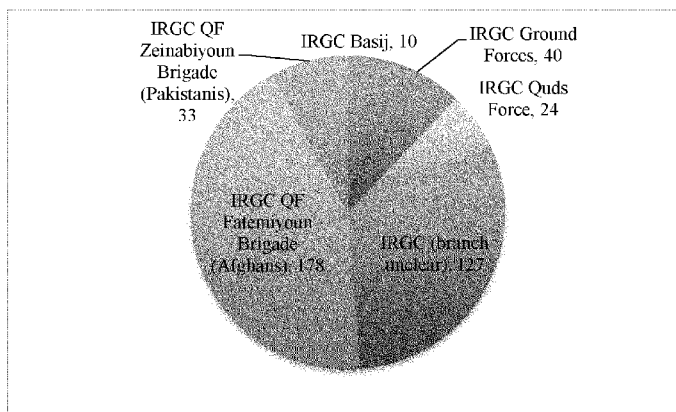


Figure 1: Breakdown by force of Afghan, Iranian, and Pakistani Shiite nationals killed in combat in Syria from January 2012 to November 30, 2015.

Public accounts indicate that all 201 Iranians served in the IRGC. Breaking down the casualties by IRGC branches, 40 served in the IRGC Ground Forces, 24 fought for the Quds Force, and 10 served in the Basij militia. Funeral photos and online biographical materials suggest that the remaining 127 were identified as generic active-duty IRGC members, though it is not known in which units they served. For some of these individuals, the lack of information may reflect the IRGC's attempt to obscure their service in the Quds Force or to cover up the deployment of IRGC Ground Forces. Deployment of the Ground Forces seems to have spiked since October 2015, in the wake of mounting casualties among the Quds Force, a relatively small unit within the Corps. This left Guard commanders with no other choice but to deploy mainline IRGC forces to Syria.

As for the Afghan and Pakistani nationals killed in action, all of the former were members of the Fatemiyoun Brigade (See Addenda, Table 2), while the latter served with the Zainabiyoun Brigade (See Addenda, Table 3). Both of these militias are reportedly organized by and report to the Quds Force. Planning for the deployment of the Fatemiyoun and Zainabiyoun Brigades likely took place as early as 2012, when Iran and Hezbollah recognized the Assad regime was in jeopardy. Maintaining the Fatemiyoun

and Zainabiyoun Brigades in Syria, despite the high casualties, may reflect a manpower shortage within the Revolutionary Guards. It certainly underscores the Assad regime's continuing need for troops. The deployment of IRGC Ground Forces in the country is fast transforming the entire Corps into an expeditionary force, which in turn increases the risk of further IRGC military adventures elsewhere in the region.

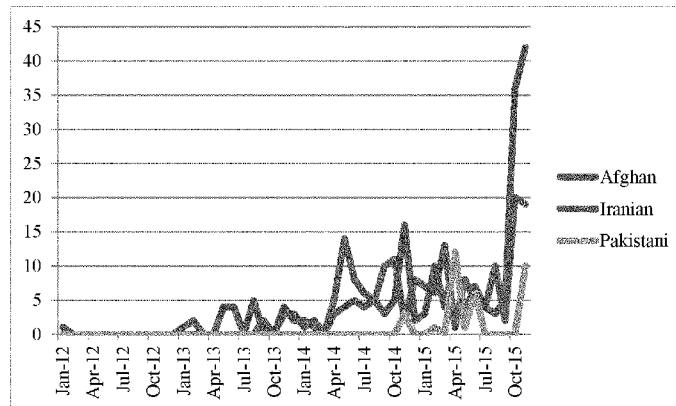


Figure 2: Burial in Iran of Afghan, Iranian, and Pakistani Shiite nationals killed in combat in Syria from January 2012 to November 30, 2015. Data excludes three Afghan nationals whose times of death are not known.

The development and use of non-Iranian Shiite militias in Syria risks the spread or rekindling of sectarian conflicts in the countries from which members of these militias hail, most notably Afghanistan, Pakistan, Lebanon, and Iraq. And last but not least, the Guard Corps' policies in Syria destabilize America's allies by exacerbating the refugee crisis in Europe and the Middle East.

The entry of Russia into the civil war appears to provide some indication of where Iran and its proxies have suffered the most casualties. Ambassador Victoria Nuland, assistant secretary of state for European and Eurasian affairs, in her recent testimony before this committee, stated, "The vast majority of Russian strikes target areas where the Assad regime has lost territory to forces led by the moderate opposition, in towns like Hama, Homs, Aleppo and Idlib."¹⁴ These locations correspond to where the IRGC has suffered the greatest losses since the end of September. (See Addenda, Table 1) The Assad regime's sustained campaign against the Syrian Sunni population, which would not be possible without Tehran's financial and military support, has been the primary driver of the mass exodus from the country. Approximately half of Syria's pre-war population of

¹⁴ Ambassador Victoria Nuland, "U.S. Policy After Russia's Escalation in Syria," *Testimony before the House Committee on Foreign Affairs*, November 4, 2015. (<http://docs.house.gov/meetings/FA/FA00/20151104/104160/HHRG-114-FA00-Wstate-NulandV-20151104.pdf>)

Ali Alfoneh

December 2, 2015

22 million people has been displaced within Syria and several millions are scattered throughout the Middle East and Europe. Since the beginning of the Russian strikes in Syria, at least 120,000 Syrians have been displaced as a result of regime, IRGC, and Shiite-militia offensives in the cities of Hama, Aleppo, and Idlib.¹⁵

Mr. Chairman, Iran's losses on the battlefield are a strong indication of how Tehran and Washington are at odds in Syria, where our stated policy is to expedite the departure of Assad.

There are steps which can be taken in order to reduce the IRGC's presence and power in Syria. These steps are intended to have an impact on the Corps' ability to destabilize Iran's neighbors.

1. Congress should write a new Authorization for the Use of Military Force (AUMF) to combat the global threat of ISIL:

The United States cannot count on Sunni regimes in the Middle East on the one hand, and the combined forces of Assad, the IRGC, Shiite militias, and Russia on the other to reach a cold peace in Syria. Continued war and perpetuation of the crisis in Syria increases the risk that the conflict will spread not only across the Middle East, but, as the recent attacks in Paris have illustrated, also to the West. Congress should therefore craft a new AUMF that provides resources to the Department of Defense and the intelligence community to fight, in cooperation with NATO, the global threat of ISIL in Syria. Coupled with diplomacy aiming at reaching a mutual understanding between Washington and Moscow about Syria, this approach can not only defeat ISIL in Syria, but also minimize the IRGC's presence in that country. Although Russia and Iran currently find themselves on the same side of the conflict and against the West, if NATO engages with Russia and provides its president Vladimir Putin with a way to protecting Russian prestige and interests in the Middle East—but only on the condition that he drop his Iranian partners—Putin will always choose Russian interests over Iran. It is important that Congress pass a new AUMF in order to provide the military muscle behind Washington's diplomatic engagement with Russia.

2. The United States government should insist on the resignation of Bashar al-Assad:

It is U.S. policy that Assad cannot remain the leader of Syria. In earlier negotiations, this had been a precondition for any diplomacy intended to find a peaceful solution to the conflict. Congress should consider legislation codifying this position, as well as the State Department's designation of Syria as a state sponsor of terrorism. Specifically, Congress could affirm that the Assad regime sponsors terrorism and that President Assad himself should be held accountable for crimes against humanity. The United States should insist

¹⁵ Ambassador Anne W. Patterson, "U.S. Policy After Russia's Escalation in Syria," *Testimony before the House Committee on Foreign Affairs*, November 4, 2015. (<http://docs.house.gov/meetings/FA/FA00/20151104/104160/HHRG-114-FA00-Wstate-PattersonA-20151104.pdf>)

that all parties in the multilateral negotiations, in particular Russia, agree that Assad will play no part in the future of Syria. Experts differ about the extent to which Russia wants to protect Assad or whether Putin could be convinced to abandon Assad if he could ensure that whatever government follows will preserve Russian interests. The Iranian supreme leader and the Revolutionary Guards, however, cannot similarly abandon Assad given the extent to which Iranian interests are intertwined with the sectarian nature of the conflict.

3. The U.S. government should halt the lifting of the UN arms embargo, set to expire in five years, and of ballistic missile restrictions, set to expire in eight, until it receives certification that Iran is no longer engaged in proxy wars and that the Quds Force and the IRGC as a whole are not engaging in international weapons sales:

Under the terms of United Nations Security Council Resolution 2231 endorsing the nuclear agreement with Iran, the conventional arms embargo on Iran will be lifted after five years. This embargo dates back to 2006 when the United Nations first banned Iran from importing materials used for conventional military hardware. Exports of military equipment were then banned in 2010. The lifting of these restrictions will allow Iran to purchase weapons from Chinese, Russians, and European manufacturers. With restrictions lifted and Iran set for a massive infusion of funds, the clerical regime will be able to purchase advanced weaponry and use its sophisticated smuggling networks to arm its proxies worldwide. Furthermore, over the longer term, Iran's ballistic missile development and its acquisition of intercontinental ballistic missile capabilities put not only U.S. allies but the United States itself at risk.

Rather than lift the arms embargo after the arbitrary time limit of five years, and the ballistic missile restrictions after eight, Congress and the administration should push the P5+1 to loosen these restrictions only after Tehran reaches benchmarks of cooperation and transparency. The lifting of the arms embargo and ballistic missile restrictions should also be tied to the regime's human rights record and ceasing its support for global terrorism. Tehran should not be rewarded with additional weaponry simply by waiting out the calendar. If the P5+1 fails to do this, the United States should strengthen its own secondary sanctions on weapons sales to Iran to discourage companies from engaging in such commerce and severely punish those who have already engaged in this trade.

4. The U.S. Government should take swift action to designate IRGC units with a documented presence in Syria and vigorously enforce sanctions against the Revolutionary Guards itself:

While the U.S. government has designated the IRGC for some of its illicit activities, and the Quds Force for its engagement in global terrorism and support for the Assad regime, other IRGC units have not yet been sanctioned.

Specifically regarding the IRGC units I have identified in my testimony, Congress should encourage the administration to designate these units from the IRGC Ground Forces in

order to hold them accountable on the international stage. The Obama administration should designate these units under authorities targeting individuals and entities that support the Assad regime and authorities targeting international terrorism. These IRGC units support a state sponsor of terrorism and may fit the legal definition of Foreign Terrorist Organizations.

Finally, my colleague Jonathan Schanzer testified last month before the House Committee on Oversight and Government Reform that the U.S. government ought to “enforce what we have left.”¹⁶ Specifically, in the case of the IRGC’s activities in Syria, this means punishing companies like Mahan Air that facilitate the shipment of weapons and fighters to Syria and openly engage in sanctions busting. And it means enforcing U.S. and international sanctions against IRGC Commander Qassem Suleimani to ensure he cannot travel to places like Russia to coordinate Iran’s strategy.

5. Congress should require the administration to provide detailed and ongoing reports on Iran’s support for the Assad regime and the IRGC’s activities in Syria:

My FDD colleague Emanuele Ottolenghi has argued that the Treasury Department should maintain and publish an IRGC watch list to alert the international business community which Iranian entities are influenced or controlled by the Guards.¹⁷ Similarly, Congress can mandate that the U.S. government publish reports revealing which IRGC units participate in the war in Syria.

More generally, Congress can insert reporting language into legislation requiring the administration to report to Congress every 90 days on the support that the Revolutionary Guards and Iran provide to Assad, including but not limited to arms, financial support, intelligence sharing, and military strategy. Iranian financial backing of Assad comes in the form of crude oil and other energy supplies, loans, lines of credit, and cash—all of which should be documented in the administration’s report to Congress.

¹⁶ Jonathan Schanzer, “Iran’s Power Projection Capability,” *Testimony before the House Committee on Oversight and Government Reform, Subcommittee on National Security*, November 5, 2015. (<https://oversight.house.gov/wp-content/uploads/2015/11/Schanzer-DefenseDemocracies-Statement-11-5-Iran.pdf>)

¹⁷ Emanuele Ottolenghi, “Major Beneficiaries of the Iran Deal: IRGC and Hezbollah,” *Testimony before the House Committee on Foreign Affairs, Subcommittee on the Middle East and North Africa*, September 17, 2015. (<http://docs.house.gov/meetings/FA/FA13/20150917/103958/HHRG-114-FA13-Wstate-OttolenghiE-20150917.pdf>)

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Addenda**Table 1:** Iranian nationals killed in combat in Syria in chronological order, January 2013 – November 20, 2015

	Name	Rank	Branch and Unit	Approximate date of death (on or prior to)	Place of death
1	Tork, Moharram ¹	Major	IRGC-QF	January 19, 2012	Damascus, Syria
2	Asgari Taqanaki, Ali ²		IRGC-QF Lebanon Force ³	January 28, 2013	Damascus, Syria
3	Shateri, Hassan, aka Hesam Khoshnevis	Brigadier General ⁴	IRGC-QF Lebanon Force, Khatam al-Anbia Construction Base Representation in Lebanon ⁵	February 13, 2013	Syria
4	Tabatabaei-Mehr, Hamid ⁶	Brigadier General ⁷	IRGC Ground Forces	February 22, 2013	Syria
5	Alizadeh, Amir-Reza	Lieutenant Colonel		May 1, 2013	Damascus, Syria ⁸
6	Kanani, Ali ⁹	Major	IRGC-QF	May 1, 2013	Syria
7	Kafizadeh, Rouhollah ¹⁰	Third Lieutenant	IRGC Isfahan 8 th Najaf Ashraf Armored division ¹¹	May 8, 2013	
8	Farhoud, Hassan Ali ¹²		IRGC-QF, IRGC Tehran Seyyed al-Shohada Brigade member, seconded to Iraqi Abolfazl al-Abbas Brigade ¹³	May 18, 2013	Damascus, Syria
9	Khorasani, Mehdi ¹⁴		IRGC-QF, seconded to Iraqi Abolfazl al-Abbas Brigade ¹⁵	June 4, 2013	Al-Qasr, Syria
10	Atri, Mohammad-Hossein ¹⁶	Major		June 4, 2013	Syria
11	Shenaei, Ali-Asghar ¹⁷		IRGC-QF Seconded to Iraqi Abolfazl al-Abbas Brigade ¹⁸	June 9, 2013	Syria
12	Tavali, Gholam-Ali ¹⁹	Second Lieutenant	IRGC Gonbad-e Kavous 60 th Emar Yaser Armored unit ²⁰	June 15, 2013	Damascus, Syria
13	Kargar Barzi, Reza ²¹		IRGC-QF ²²	August 2, 2013	Syria

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14	Heydari, Esmail ²³	Brigadier General Second Class	IRGC-QF	August 16, 2013	Syria
15	Baghbani, Hadi ²⁴		IRGC-QF, Seconded to Iraqi Abolfazl al-Abbas Brigade ²⁵	August 19, 2013	Damascus, Syria
16	Akbar, Alizadeh ²⁶	Second Lieutenant	IRGC Mashhad 21 st Imam Reza Brigade ²⁷	August 22, 2013	Damascus, Syria
17	Heydari, Mohsen ²⁸	Major ²⁹	IRGC-QF, seconded to Iraqi Abolfazl al-Abbas Brigade ³⁰	August 22, 2013	Syria
18	Jamali Paqaleh, aka Jamalizadeh, Mohammad ³¹	Brigadier General	IRGC-QF	November 5, 2013	Syria
19	Dousti-ye Kalateh Rahman, Ahmad ³²			November 11, 2013	Syria
20	Khalili, Mohammad-Hassan (aka Rasoul, aka Abou-Khalil) ³³		Basij veteran of the 2009 suppression of the anti-regime rallies ³⁴	November 18, 2013	Damascus, Syria
21	Moradi, Mohammad-Hossein ³⁵	Basij member	Najaf-e Ashraf Basij Base of the Imam Ali Mosque Basij member	November 19, 2013	Syria
22	Moslemi-Savari, Nasser (aka Mansour) ³⁶			December 8, 2013	Syria
23	Shirvanian, Abolfazl ³⁷		IRGC Tehran Seyyed al-Shohada Basij Base member ³⁸	December 18, 2013	Damascus, Syria
24	Beyzaei, Mahmoud-Reza (aka Hossein Nosrati) ³⁹		IRGC-QF ⁴⁰	January 22, 2014	Damascus, Syria
25	Shahriari, Akbar ⁴¹		IRGC-QF	January 22, 2014	Damascus, Syria
26	Sharifi, Jahanpour ⁴²	Major	IRGC Jahrom al-Mahdi Airborne Brigade	February 1, 2014	Damascus, Syria
27	Heydari, Javid ⁴³			April 10, 2014	Syria
28	Shojaee, Qassem ⁴⁴			April 17, 2014	Syria

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29	Alipour, Moharram ⁴⁵	Captain		April 27, 2014 ⁴⁶	Syria
30	Alizadeh, Amir-Reza ⁴⁷	Colonel Second Class	IRGC-QF ⁴⁸	May 4, 2014	Damascus, Syria
31	Qassemi, Hassan ⁴⁹			May 14, 2014	Damascus, Syria
32	Hassani, Qorban ⁵⁰			May 25, 2014	Syria
33	Qorbani, Mirza-Hosseini ⁵¹			May 31, 2014	Syria
34	Eskandari, Abdollah ⁵²	Brigadier General		June 14, 2014 ⁵³	Hama, Syria
35	Bakhtiari, Mohammad-Javad ⁵⁴			June 15, 2014	Syria
36	Hosseini, Mohammad-Amin ⁵⁵			June 15, 2014	Syria
37	Hosseini, Morteza ⁵⁶			June 18, 2014	Syria
38	Sheibani, Dad-Allah Dehqan	Brigadier General ⁵⁷		June 26, 2014	Hama, Syria
39	Mousavi, Hassan ⁵⁸			July 4, 2014	Syria
40	Mirzaei, Reza ⁵⁹			July 3, 2014	Syria
41	Mousavi, Hassan ⁶⁰			July 3, 2014	Syria
42	Alizadeh, Abbas ⁶¹			July 3, 2014	Syria
43	Azizi, Mehdi ⁶²		IRGC-QF seconded to Iraqi Abolfazl al-Abbas Brigade ⁶³	August 4, 2014	Damascus, Syria
44	Soltanzadeh, Hadi ⁶⁴		IRGC-QF	August 21, 2014	Damascus, Syria
45	Rahmati, Abdollah ⁶⁵			August 21, 2014	Syria
46	Soltannejad, Hadi ⁶⁶			August 21, 2014	Syria
47	Kazemi, Mousa ⁶⁷	Second Lieutenant	IRGC Isfahan 8 th Najaf-e Ashraf Armored Division	August 28, 2014	Syria
48	Heydari, Rahman ⁶⁸			September 3, 2014	Damascus, Syria
49	Gholami, Mohammad-Yasin ⁶⁹			September 11, 2014 ⁷⁰	Syria

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50	Hosseini, Abolfazi ⁷¹			September 12, 2014	Syria
51	Tabasteh, Hossein ⁷²			September 16, 2014	Damascus, Syria
52	Afshar, Qorban-Ali ⁷³			September 18, 2014	Damascus, Syria
53	Hosseini, Mohammad-Reza ⁷⁴			October 2, 2014	Syria
54	Darisavi, Jabbar (aka Farid) ⁷⁵	Brigadier General		October 9, 2014	Damascus, Syria
55	Ahmadi, Hamed ⁷⁶			October 9, 2014	Syria
56	Qassemi, Hamid ⁷⁷			October 11, 2014	Syria
57	Zamani, Hamid-Reza ⁷⁸		IRGC Basij Organization	October 28, 2014	Damascus, Syria
58	Abtahi, Ali-Akbar ⁷⁹			November 13, 2014	Syria
59	Hosseini, Taqi ⁸⁰			November 13, 2014	Syria
60	Tabrizi, Behrouz Rahim ⁸¹			November 13, 2014	Syria
61	Akbarnejad, Hossein ⁸²			November 13, 2014	Syria
62	Zamani-Far, Masoud ⁸³			November 13, 2014	Damascus, Syria
63	Fard-Taheri, Majid ⁸⁴			November 13, 2014	Damascus, Syria
64	Younesi, Mohammad ⁸⁵			November 13, 2014	Syria
65	Ali-Naqi, Rasoul ⁸⁶			November 13, 2014	Syria
66	Erfani, Hamid-Reza ⁸⁷			November 13, 2014	Syria
67	Azhdari, Mehdi ⁸⁸			November 13, 2014	Syria
68	Jam-Manesh, Reza ⁸⁹			November 13, 2014	Syria
69	Rafei, Ali-Asghar ⁹⁰			November 13, 2014	Syria
70	Esmacili, Sheikhan, Mohammad			November 13, 2014	Syria

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71	Ziaepour, (first name unknown) ⁹¹			November 13, 2014	Syria
72	Dorostkar, (first name unknown) ⁹²			November 13, 2014	Syria
73	Hozbavi, Hassan ⁹³	Second Lieutenant		November 30, 2014	Syria
74	Mohammadi, Nour-Mohammad ⁹⁴			December 30, 2014	Syria
75	Shojaee, Habib-Allah ⁹⁵			December 30, 2014	Damascus, Syria
76	Ahmadi, Hossein ⁹⁶		IRGC-QF	January 11, 2015	Damascus, Syria
77	Mousavi, Mehdi ⁹⁷		10 th Basij Resistance Zone deputy ⁹⁸	January 18, 2015	Damascus, Syria
78	Allahdadi, Mohammad-Ali ⁹⁹		IRGC-QF	January 18, 2015	Quneitarah, Syria
79	Heydari, Mohammad-Aziz ¹⁰⁰			February 3, 2015	Damascus, Syria
80	Heydari, Mostafa ¹⁰¹			February 3, 2015	Damascus, Syria
81	Kazemzadeh, Amir ¹⁰²		IRGC-QF	February 3, 2015	Damascus, Syria
82	Ansari, Taleb-Hossein ¹⁰³			February 6, 2015	Damascus, Syria
83	Haji-Hatmlou, Ehsan ¹⁰⁴		IRGC 45 th Javad al-Aemeh Brigade	February 8, 2015	Aleppo, Syria ¹⁰⁵
84	Abdollahi, Abbas ¹⁰⁶	Commander	IRGC 31 st Ashoura Division, ¹⁰⁷ Saberin Brigade chief	February 14, 2015	Kafr Nasij, Syria
85	Soltan-Moradi, Ali ¹⁰⁸			February 14, 2015	Kafr Nasij, Syria
86	Hosseini, Abdollah ¹⁰⁹			February 24, 2015	Syria
87	Hosseini, Noura ¹¹⁰			February 24, 2015	Syria
88	Ehsani, Hamid ¹¹¹			February 26, 2015	Syria
89	Khavari, Mohammad-Ali ¹¹²			March 4, 2015	Syria

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90	Ardakani, Mohammad Saheb-Karam ¹¹³	Captain		March 4, 2015	Syria
91	Sohrabi, Heshmat-Allah ¹¹⁴			March 15, 2015	Syria
92	Taheri, Masoud ¹¹⁵			March 21, 2015	Syria
93	Kamali-Dehqan, Mohsen ¹¹⁶		IRGC Martyr Jahaziha base in Rajae-Shahr, Alborz	April 17, 2015	Aleppo, Syria
94	Malamiri, Mohammad-Mehdi ¹¹⁷	Cleric		April 20, 2015	Deraa, Syria
95	Helisaei, Rouzbeh ¹¹⁸			April 22, 2015	Syria
96	Badpa, Hossein ¹¹⁹			April 22, 2015	Deraa, Syria
97	Mohammadi, Morteza ¹²⁰			April 22, 2015	Syria
98	Ahmadi, Ahmad ¹²¹			April 22, 2015	Syria
99	Hosseini, Abd al-Samad ¹²²			April 23, 2015	Syria
100	Habib-Allah-pour, Jalal ¹²³	Colonel	IRGC 25 th Karbala Division	April 23, 2015	Syria
101	Bakhshi, Ramezan-Ali ¹²⁴			April 23, 2015	Syria
102	Karimi, Abbas ¹²⁵			April 23, 2015	Syria
103	Naderi, Isa ¹²⁶			April 25, 2015	Syria
104	Kajbaf, Hadi ¹²⁷			May 5, 2015	Basri al-Harir, Syria ¹²⁸
105	Javani, Hamed ¹²⁹	First Lieutenant		May 13, 2015	Latakia, Syria
106	Shirdel, Ali-Asghar ¹³⁰			May 21, 2015	Syria
107	Bakhtiari, Aqil ¹³¹		IRGC Basij Organization	June 8, 2015	Syria
108	Nowrouzi, Ali-Reza ¹³²			June 12, 2015	Syria
109	Hamidi, Mohammad (aka Abou-Zeinab) ¹³³		IRGC-QF	June 24, 2015	Deraa, Syria

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110	Ghaffari, Hassan ¹³⁴			June 24, 2015	Deraa, Syria
111	Amraei, Ali ¹³⁵			June 24, 2015	Deraa, Syria
112	Jafari, Nemat-Allah ¹³⁶			June 24, 2015	Deraa, Syria
113	Javani, Hamed ¹³⁷	Captain	IRGC East Azerbaijan Ashoura Division	June 26, 2015	Idlib, Syria
114	Gharib, Qassem ¹³⁸	Colonel	IRGC Golestan Neynava Force deputy	July 13, 2015	Tadmor, Syria
115	Ghavabesh, Karim ¹³⁹			July 15, 2015	Syria
116	Bakhti, Mostafa			July 30, 2015	Tadmor, Syria
117	Bakhti, Mojtaba			July 30, 2015	Tadmor, Syria
118	Hayari, Ahmad ¹⁴⁰	Captain	Basij Imam Hussein Brigade commander in Shoush	August 30, 2015	Latakia, Syria
119	Rezaei, Mohammad-Davoud			August 31, 2015	Syria
120	Baqeri, Mohammad-Taqi ¹⁴¹			August 31, 2015	Syria
121	Rezaei, Gholam-Ali ¹⁴²			September 11, 2015	Syria
122	Khalili, Mohammad ¹⁴³			September 11, 2015	Syria
123	Dinarvand, Abd al-Amir ¹⁴⁴			September 18, 2015	Syria
124	Qanavati, Ali-Reza ¹⁴⁵			October 6, 2015	Syria
125	Hosseini, Meisam ¹⁴⁶			October 8, 2015	Syria
126	Hamadani, Hossein (aka Abou-Wahab) ¹⁴⁷	Brigadier General	IRGC Greater Tehran 27 th Mohammad Rasoul-Allah Division Commander. Chief adviser to the government of Syria since 2011.	October 8, 2015	Aleppo, Syria

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127	Mokhtarband, Hamid (aka Abou-Zahra) ¹⁴⁸	Colonel ¹⁴⁹	IRGC Ahwaz Hazrat-e Hojjat Armored Brigade Combat team chief	October 13, 2015	Syria
128	Hassounizadeh, Farshad (aka Abou-Nasser) ¹⁵⁰	Colonel ¹⁵¹	IRGC Ahwaz Hazrat-e Hojjat Armored Brigade Combat team deputy, Saber in Brigade member	October 13, 2015	Syria
129	Pourmorad, Rasoul ¹⁵²			October 14, 2015	Syria
130	Hamid, Nader ¹⁵³			October 14, 2015	Quneitra, Syria
131	Hakimizadeh, first name unknown ¹⁵⁴			October 15, 2015	Syria
132	Mokhtarifar, Majid ¹⁵⁵			October 15, 2015	Syria
133	Jalalzadeh, Jalal ¹⁵⁶			October 15, 2015	Syria
134	Khizab, Moslem ¹⁵⁷	Colonel	IRGC Isfahan 14 th Imam Hossein Division Ya-Zahra Brigade chief	October 19, 2015	Syria
135	Alidoust, Mehdi ¹⁵⁸		IRGC Qom 17 th Ali Ibn Abi-Taleb	October 19, 2015	Syria
136	Qorbani, Komeil ¹⁵⁹	First Lieutenant	IRGC Isfahan 8 th Najaf-e Ashraf Armored Division	October 19, 2015	Syria
137	Ahmadi, Hassan ¹⁶⁰	Second Lieutenant	IRGC Isfahan 8 th Najaf-e Ashraf Armored Division	October 19, 2015	Syria
138	Karami, Mojtaba (aka Majid) ¹⁶¹	First Lieutenant ¹⁶²	IRGC-QF, Hamadan Imam Hossein 154 th Hazrat-e Ali-Akbar special operations battalion	October 20, 2015	Syria
139	Sanei, Majid ¹⁶³		IRGC Hamadan Imam Hossein 161 st Battalion	October 20, 2015	Syria
140	Damroudi, Reza ¹⁶⁴			October 20, 2015	Al-Hasaka, Syria
141	Shojaee, Hadi ¹⁶⁵			October 23, 2015	Syria

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142	Mostafavi, Milad ¹⁶⁶		IRGC Bahar County 165 th Imam Hossein Brigade member	October 24, 2015	Syria
143	Baqeri Niyaraki, Abdollah ¹⁶⁷		IRGC Ansar al-Mahdi Protection Unit ¹⁶⁸ Previously Ahmadinejad's bodyguard ¹⁶⁹	October 24, 2015	Aleppo, Syria
144	Estehkami, Mohammad ¹⁷⁰	Sergeant Major (Staff)		October 24, 2015	Syria
145	Karimi, Amin ¹⁷¹		IRGC Ansar al-Mahdi Protection Unit, ¹⁷² served as bodyguard in the parliament	October 25, 2015	Aleppo, Syria
146	Sadrzadeh, Mohammad (aka Mostafa, aka Seyyed Ebrahim, aka Badrzadeh, aka Seyyed Ebrahim Sa'ati) ¹⁷³		Fatemiyoun Division Emar Brigade chief	October 25, 2015	Aleppo, Syria
147	Tahernia, Sajjad ¹⁷⁴			October 25, 2015	Syria
148	Emadi, Rouh-Allah ¹⁷⁵	First Lieutenant		October 25, 2015	Aleppo, Syria
149	Daei-Taqi, Hamid-Reza ¹⁷⁶		Al-Mahdi Basij Base chief in Isfahan ¹⁷⁷	October 26, 2015	Syria
150	Eraqi, Jabbar ¹⁷⁸			October 26, 2015	Syria
151	Izadi, Pouya ¹⁷⁹	Second Lieutenant	Previously served in 8 th Najaf-e Ashraf Armored Division ¹⁸⁰	October 26, 2015	Syria
152	Amjadian, Abouzar (aka Raouf) ¹⁸¹			October 27, 2015	Aleppo, Syria
153	Asgari-Fard, Mohammad-Reza ¹⁸²	Colonel		October 27, 2015	Syria
154	Kaeni, Mehdi ¹⁸³			October 28, 2015	Syria
155	Nasr, Moslem ¹⁸⁴	Second Lieutenant	IRGC 33 rd al-Mahdi Airborne Brigade	October 28, 2015	Aleppo, Syria
156	Jamali, Hossein ¹⁸⁵	Captain ¹⁸⁶	IRGC Saberin Brigade	October 29, 2015	Syria

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157	Zahiri, Mohammad ¹⁸⁷	Third Lieutenant	IRGC Hazrat-e Hojjat Saber in Brigade	October 30, 2015	Syria
158	Shorbani, Hojjat Asghar ¹⁸⁸			October 30, 2015	Aleppo, Syria
159	Mir-Dousti, Mohammad-Hosseini ¹⁸⁹		IRGC Greater Tehran Mohammad Rasoul-Allah Division	October 31, 2015	Syria
160	Fatemi, Hamid Athar, ¹⁹⁰ aka Mombini ¹⁹¹			November 2, 2015	Syria
161	Hosseini, Sajjad ¹⁹²	Captain ¹⁹³	IRGC Isfahan Khordad 15 th Artillery Group ¹⁹⁴	November 2, 2015	Syria
162	Suleimani Margh-Maleki, Ezzat-Allah ¹⁹⁵	Colonel	Veteran of the IRGC Chahar-Mahal va Bakhtiari Hazrat-e Amir 44 th Qamar-e Bani-Hashem Brigade ¹⁹⁶	November 3, 2015	Syria
163	Zahedpour, Esmail ¹⁹⁷		IRGC Golestan Neynava Saber in Brigade member ¹⁹⁸	November 3, 2015	Syria
164	Hosseini Alemi, Ali (aka Abou-Sajjad) ¹⁹⁹		IRGC-QF Fatemiyoun Division commander	November 3, 2015	Syria
165	Fanousi, Mohammad ²⁰⁰	Second Lieutenant ²⁰¹	43 rd Malayer Corps of Engineers	November 4, 2015	Syria
166	Qorbani, Rouhollah ²⁰²		Basij	November 5, 2015	Aleppo, Syria
167	Sarlak, Qadir ²⁰³		IRGC Greater Tehran Mohammad Rasoul-Allah Division	November 5, 2015	Aleppo, Syria
168	Hiyudi, Amir-Hassan ²⁰⁴			November 5, 2015	Syria
169	Shalika ²⁰⁵	Brigadier General, Second Class ²⁰⁶	Former IRGC Semnan province chief	November 6, 2015	Aleppo, Syria
170	Aziz-Abadi, Mohammad-Hosseini ²⁰⁷	First Lieutenant		November 7, 2015	Aleppo, Syria

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171	Khani, Mohammad-Hossein ²⁰⁸		Yazd Azad University Basij chief ²⁰⁹	November 7, 2015	Syria
172	Jamshidian, Mousa ²¹⁰	Major	IRGC Isfahan 8 th Najaf-e Ashraf Armored Division	November 7, 2015	Syria
173	Siratnia, Seyyed Esmaeel ²¹¹		Greater Tehran Mohammad Rasoul-Allah	November 7, 2015	Aleppo, Syria
174	Tamamzadeh, Ali (aka Abou-Hadi) ²¹²	Cleric		November 8, 2015	Syria
175	Modvari, Meisam ²¹³			November 8, 2015	Syria
176	Tahan, Mohammad ²¹⁴	Major	Semnan Qaem-e Al-e Mohammad 12 th Brigade	November 9, 2015	Aleppo, Syria
177	Ataei, Ahmad ²¹⁵			November 14, 2015	Aleppo, Syria
178	Dehqan Amiri, Mohammad-Reza ²¹⁶	Theological student		November 14, 2015	Aleppo, Syria
179	Mousavi, Mostafa ²¹⁷			November 14, 2015	Aleppo, Syria
180	Asgari, Masoud ²¹⁸			November 14, 2015	Aleppo, Syria
181	Khazaninejad, Iman ²¹⁹	First Lieutenant ²²⁰		November 15, 2015	Aleppo, Syria ²²¹
182	Qorbani, Mohammad-Javad ²²²	Second Lieutenant	Haji-Abad Basij Base chief	November 16, 2015	Syria
183	Abbasi, Sattar ²²³			November 17, 2015	Syria
184	Ebrahimi, Mohammad-Reza ²²⁴			November 18, 2015	Aleppo, Syria ²²⁵
185	Sokhandan, Mohammad ²²⁶			November 18, 2015	Aleppo, Syria
186	Doust-Hassanzadeh, Ali ²²⁷			November 18, 2015	Syria
187	Qalandari, Mahmoud ²²⁸			November 18, 2015	Syria
188	Mohamadi, Javad ²²⁹			November 23, 2015	Syria

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189	Hashemi, Hossein ²³⁰			November 23, 2015	Syria
190	Rahimi, Ahmad ²³¹	Second Lieutenant		November 23, 2015	Syria
191	Majiri, Abd al-Reza ²³²	Brigadier General, Second Class	IRGC 123 rd Imam Hossein Brigade	November 27, 2015	Syria
192	Siahkali Moradi, Hamid ²³³		IRGC 82 nd Saheb al-Amr Brigade	November 28, 2015	Syria
193	Bameri, Parviz ²³⁴			November 28, 2015	Syria
194	Bameri, Asghar ²³⁵			November 28, 2015	Syria
195	Bameri, Nazar-Mohammad ²³⁶			November 28, 2015	Syria
196	Abdollahi, Morad ²³⁷			November 28, 2015	Syria
197	Bameri, Salman Barjesteh ²³⁸			November 28, 2013	Syria
198	Sajadi, Mohsen ²³⁹			November 28, 2015	Syria
199	Mollazehi, Omar ²⁴⁰			November 28, 2015	Syria
200	Ataei Farkoush, Ahmad ²⁴¹			November 28, 2015	Syria
201	Rashvand, Abd al-Rashid ²⁴²	Colonel		November 29, 2015	Syria

Table 2: Shiite Afghan nationals of the Fatemiyoun Brigade of the IRGC-QF killed in combat in Syria in chronological order, September 1, 2013 – November 20, 2015

	Name	Approximate date of death (on or prior to)	Place of death
1	Vaezi, Azim ²⁴³	September 1, 2013	Syria
2	Abou-Ali, Mohammad ²⁴⁴	September 1, 2013	Syria
3	Salmani, Mehdi ²⁴⁵	November 26, 2013	Syria
4	Torabi, Ahmad ²⁴⁶	November 26, 2013	Syria
5	Jafari, Yaser ²⁴⁷	November 26, 2013	Syria
6	Hosseini, Ali ²⁴⁸	December 8, 2013	Syria
7	Mirzaei, Najib-Allah ²⁴⁹	December 8, 2013	Syria
8	Mohseni, Ali ²⁵⁰	December 9, 2013	Syria
9	Hosseini, Shir-Aqa ²⁵¹	January 15, 2014	Syria
10	Esmaceli, Reza ²⁵²	February 1, 2014	Syria
11	Hosseini, Mohammad-Qassem ²⁵³	February 13, 2014	Syria
12	Hosseini, Mohammad-Taqi ²⁵⁴	April 8, 2014	Syria
13	Salehi, Ali ²⁵⁵	April 8, 2014	Syria

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14	Shojaee, Qassem ²⁵⁶	April 17, 2014	Syria
15	Mohammadian, Nasim ²⁵⁷	April 17, 2014	Syria
16	Mohammadi, Ali-Reza ²⁵⁸	April 21, 2014	Syria
17	Rasouli, Mohammad Jomeh ²⁵⁹	May 1, 2014	Syria
18	Sajadi, Javad ²⁶⁰	May 2, 2014	Syria
19	Jafari, Zaman ²⁶¹	May 8, 2014	Syria
20	Ebrahimi, Ali-Akbar ²⁶²	May 9, 2014	Syria
21	Hosseini, Ahmad ²⁶³	May 9, 2014	Syria
22	Mahmoudi, Hossein ²⁶⁴	May 9, 2014	Syria
23	Arefi, Ahmad ²⁶⁵	May 13, 2014	Syria
24	Hosseini, Jafar ²⁶⁶	May 13, 2014	Syria
25	Hamidi, Abbas-Ali ²⁶⁷	May 16, 2014	Syria
26	Hosseini, Ali ²⁶⁸	May 16, 2014	Syria
27	Hosseini, Qorban ²⁶⁹	May 16, 2014	Syria
28	Qassemi, Nour-Mohammad ²⁷⁰	May 16, 2014	Syria
29	Mousavi, Nour-Mohammad ²⁷¹	May 16, 2014	Syria
30	Vaezi, Mojtaba ²⁷²	May 19, 2014	Syria
31	Adeli, Ali ²⁷³	June 2, 2014	Syria
32	Mortazavi, Mohammad ²⁷⁴	June 15, 2014	Syria
33	Rahimi, Mohammad-Javad ²⁷⁵	June 15, 2014	Syria
34	Hosseini, Mostafa ²⁷⁶	June 16, 2014	Syria
35	Jafari, Mostafa ²⁷⁷	June 16, 2014	Aleppo, Syria
36	Karimi, Mohammad-Shafi'e ²⁷⁸	June 16, 2014	Syria
37	Sadeqi, Hamid ²⁷⁹	June 24, 2014	Syria
38	Amanollah, Shir-Ali ²⁸⁰	June 28, 2014	Syria
39	Javadi, Hossein ²⁸¹	July 1, 2014	Syria
40	Rasouli, Heydar ²⁸²	July 4, 2014	Syria
41	Qorbani, Mohammad ²⁸³	July 4, 2014	Syria
42	Sajadi, Assadollah ²⁸⁴	July 9, 2014	Syria
43	Moradi, Najib-Allah ²⁸⁵	July 27, 2014	Syria
44	Kalani, Mahmoud ²⁸⁶	August 5, 2014	Syria
45	Mousavi, Ali-Asghar ²⁸⁷	August 10, 2014 ²⁸⁸	Syria
46	Qorbani, Boustan ²⁸⁹	August 16, 2014 ²⁹⁰	Syria
47	Ganji, Gholam-Ali ²⁹¹	August 22, 2014	Syria
48	Panahi, Gholam-Ali ²⁹²	August 22, 2014	Syria
49	Mohammadi, Sadeq	September 1, 2014	Syria
50	Mousavi, Javid ²⁹³	September 11, 2014	Syria
51	Rasouli, Aziz-Allah ²⁹⁴	September 11, 2014	Syria
52	Khodapanah, Mohamma-Hossein ²⁹⁵	September 11, 2014 ²⁹⁶	Syria
53	Akbari, Mohammad-Hossein ²⁹⁷	September 12, 2014	Syria
54	Forqani, Ali ²⁹⁸	September 15, 2014	Syria
55	Khodadai, Hafiz-Allah	September 23, 2014 ²⁹⁹	Syria

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56	Rezaei, Mohammad ³⁰⁰	September 24, 2014	Syria
57	Yousefi, Asghar ³⁰¹	October 4, 2014 ³⁰²	Syria
58	Hosseini, Reza ³⁰³	October 8, 2014	Syria
59	Mohammad-Ahmadi, Gholam ³⁰⁴	October 11, 2014	Syria
60	Ahmadi, Gholam-Mohammad ³⁰⁵	October 14, 2014	Syria
61	Hosseini, Isa ³⁰⁶	October 14, 2014	Syria
62	Salimi, Hadi ³⁰⁷	October 14, 2014	Syria
63	Khademi, Mostafa ³⁰⁸	October 14, 2014	Syria
64	Shabani, Raouf ³⁰⁹	October 14, 2014	Syria
65	Hosseini, Esmael ³¹⁰	October 17, 2014	Syria
66	Mohammadi, Sadeq ³¹¹	October 18, 2014	Syria
67	Ebrahimi, Ali-Mohammad ³¹²	October 23, 2014	Syria
68	Samir, Seyyed ³¹³	November 29, 2014	Syria
69	Amini, Mohammad-Nader ³¹⁴	November 29, 2014	Syria
70	Rezaei, Ebrahim ³¹⁵	December 8, 2014	Syria
71	Hosseini, Mohammad-Hossein ³¹⁶	December 27, 2014	Syria
72	Hosseini, Gholam Sakhi ³¹⁷	December 20, 2014	Syria
73	Qassemi, Zavarshah ³¹⁸	December 20, 2014	Syria
74	Hosseini, Mohammad-Mehdi ³¹⁹	December 26, 2014	Syria
75	Karimi, Mostafa ³²⁰	December 26, 2014	Syria
76	Hosseini, Reza	December 30, 2014	Syria
77	Mousavi, Eshaq	December 31, 2014 ³²¹	Basri al-Harir, Syria
78	Mirzaei, Ramezan ³²²	January 8, 2015	Aleppo, Syria ³²³
79	Tavasoli, Mohammad-Reza ³²⁴	January 10, 2015	Syria
80	Gholami, Javad ³²⁵	January 10, 2015	Syria
81	Hosseini, Mohammad ³²⁶	January 21, 2015 ³²⁷	Syria
82	Hosseini, Ayatollah ³²⁸	January 25, 2015	Syria
83	Yazdani, Hamid ³²⁹	January 26, 2015 ³³⁰	Syria
84	Hezareh, Naqib-Allah ³³¹	January 29, 2015 ³³²	Syria
85	Barati, Hossein ³³³	February 3, 2015	Syria
86	Hosseini, Hassan ³³⁴	February 3, 2015	Rif, East Damascus, Syria ³³⁵
87	Sharifi, Davoud ³³⁶	February 9, 2015	East Damascus, Syria
88	Ali Mousa, Reza-Mohammad ³³⁷	February 12, 2015	Rif, Aleppo, Syria
89	Bakhshi, Reza (aka Fateh) ³³⁸	February 18, 2015	Daraa, Syria
90	Tavasoli, Ali-Reza (aka Yasini, aka Abu-Hamed) ³³⁹	February 28, 2015	Daraa, Syria
91	Rezaei, Naim ³⁴⁰	March 1, 2015	Syria
92	Hakimi, Mahmoud ³⁴¹	March 2, 2015	Syria
93	Yousefi, Javid ³⁴²	March 2, 2015	Syria

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94	Najafi, Nemat-Allah ³⁴³	March 2, 2015	Syria
95	Sadat, Qassem ³⁴⁴	March 2, 2015	Syria
96	Hosseini, Hossein ³⁴⁵	March 2, 2015	Syria
97	Ghaznavi, Abouzar ³⁴⁶	March 8, 2015	Syria
98	Qorbani, Hossein ³⁴⁷	March 8, 2015	Syria
99	Nazari, Nemat ³⁴⁸	March 8, 2015	Syria
100	Shojaei, Mohammad ³⁴⁹	March 8, 2015	Syria
101	Saberi, Mehdi ³⁵⁰	March 10, 2015	Syria
102	Ahmadi, Mostafa ³⁵¹	March 12, 2015	Syria
103	Alizadeh, Ali ³⁵²	March 12, 2015	Syria
104	Mohammadi, Mohammad-Javad ³⁵³	April 15, 2015	Syria
105	Egballi, Salim ³⁵⁴	May 4, 2015	Syria
106	Mazloun, Qambar-Ali ³⁵⁵	May 5, 2015	Syria
107	Mohammadi, Gholam-Reza ³⁵⁶	May 8, 2015	Syria
108	Mahmoudi, Hassan	May 8, 2015	Syria
109	Hosseini, Ahmad	May 8, 2015	Syria
110	Qorbani, Taher	May 8, 2015	Syria
111	Qassemi-Dana, Hassan (aka Hassan Qassempour) ³⁵⁷	May 9, 2015	Syria
112	Sajadi, Esmaeel ³⁵⁸	May 14, 2015	Syria
113	Mirzaei, Mojtaba ³⁵⁹	June 25, 2015	Syria
114	Hosseini, Mojtaba ³⁶⁰	June 25, 2015	Syria
115	Hashemi, Mohammad-Hadi ³⁶¹	June 25, 2015	Syria
116	Farahani, Hassan ³⁶²	June 25, 2015	Syria
117	Hashemi, Sarvar ³⁶³	June 25, 2015	Syria
118	Zafardoust, Hossein ³⁶⁴	July 7, 2015	Syria
119	Hosseini, Ahmad-Ali ³⁶⁵	July 16, 2015	Syria
120	Mousavi, Rouhollah ³⁶⁶	July 17, 2015	Syria
121	Ebrahimi, Mohammad ³⁶⁷	July 23, 2015	Syria
122	Mousavi, Rouhollah (aka Peyman) ³⁶⁸	July 25, 2015	Syria
123	Amiri, Mojtaba ³⁶⁹	August 7, 2015	Syria
124	Hosseini, Kazem ³⁷⁰	August 7, 2015	Syria
125	Javadi, First name unknown ³⁷¹	August 7, 2015	Syria
126	Hosseini, Mohammad (aka Heshmat) ³⁷²	August 8, 2015	Deraa, Syria
127	Ahmadi, Mehdi ³⁷³	August 23, 2015	Syria
128	Qalandari, Salman ³⁷⁴	August 24, 2015	Syria
129	Ahmadi, Mehdi ³⁷⁵	August 24, 2015	Syria
130	Didari, Abdollah ³⁷⁶	August 24, 2015	Syria
131	Heydari, Esmaeil ³⁷⁷	August 24, 2015	Syria
132	Alizadeh, Mousa ³⁷⁸	August 27, 2015	Syria
133	Jafari, Mohammad	September 22, 2015	Syria
134	Heydari, Gholam-Hossein ³⁷⁹	September 23, 2015	Syria
135	Mousavi, Esmaeil ³⁸⁰	September 28, 2015	Syria
136	Hosseini, Nazer ³⁸¹	September 28, 2015	Syria
137	Hosseini, Sajed ³⁸²	October 8, 2015	Syria
138	Dad, Ali ³⁸³	October 8, 2015	Syria

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139	Rahimi, Reza ³⁸⁴	October 8, 2015	Syria
140	Alizadeh, Ali-Asghar ³⁸⁵	October 8, 2015	Syria
141	Bakhshi, Amir ³⁸⁶	October 8, 2015	Syria
142	Beygi, Ali-Doust ³⁸⁷	October 8, 2015	Syria
143	Qorbani, Reza ³⁸⁸	October 8, 2015	Syria
144	Hosseini, Aref ³⁸⁹	October 12, 2015	Syria
145	Mardani, Yar-Mohammad ³⁹⁰	October 12, 2015	
146	Rahimi, Mohammad-Rahim ³⁹¹	October 14, 2015	Syria
147	Khademi, Mohammad-Ali ³⁹²	October 15, 2015	Syria
148	Rahim, Karbalaei-Mohammad-Rahim ³⁹³	October 15, 2015	Syria
149	Hezareh, Ali-Mohammad ³⁹⁴	October 19, 2015	Syria
150	Hosseini, Mojtaba ³⁹⁵	October 21, 2015	Syria
151	Hosseini, Seyyed-Zia ³⁹⁶	October 21, 2015	Syria
152	Gholami, Ali ³⁹⁷	October 21, 2015	Syria
153	Khavari, Reza (aka Hojjat) ³⁹⁸	October 24, 2015	Aleppo, Syria
154	Hosseini, Mohammad-Ali ³⁹⁹	October 26, 2015	Syria
155	Anvari, Heydar (aka Rostami) ⁴⁰⁰	October 27, 2015	Syria
156	Yousefi, Khan-Ali ⁴⁰¹	October 28, 2015	Aleppo, Syria
157	Karimi, Esmat-Allah ⁴⁰²	November 4, 2015	Syria
158	Hosseini, Hamid ⁴⁰³	November 4, 2015	Syria
159	Alemi, Ali ⁴⁰⁴	November 12, 2015	Syria
160	Rahimi, Ali ⁴⁰⁵	November 12, 2015	Syria
161	Yaqoubi, Ebrahim ⁴⁰⁶	November 12, 2015	Syria
162	Barati, Mohammad ⁴⁰⁷	November 12, 2015	Syria
163	Ahmadi, Mohammad-Reza ⁴⁰⁸	November 12, 2015	Syria
164	Akbari, Javad ⁴⁰⁹	November 12, 2015	Syria
165	Hosseini, Morteza ⁴¹⁰	November 20, 2015	Syria
166	Moqaddam, Sardar	November 23, 2015	Syria
167	Hashemi, Hossein ⁴¹¹	November 24, 2015	Syria
168	Rahimi, Zaher ⁴¹²	November 24, 2015	Syria
169	Modaber, Hossein ⁴¹³	November 24, 2015	Syria
170	Abbasi, Nour-Mohammad ⁴¹⁴	November 25, 2015	Syria
171	Babaei, Zabih-Allah ⁴¹⁵	November 27, 2015	Syria
172	Heydari, Zaker ⁴¹⁶	November 30, 2015	Syria
173	Shah-Rezaei, Habib ⁴¹⁷	November 30, 2015	Syria
174	Akbari, Fakhr al-Din ⁴¹⁸	November 30, 2015	Syria
175	Jomeh-Mohammadi, Mohammad ⁴¹⁹	November 30, 2015	Syria
176	Heydari, Habib-Allah ⁴²⁰		Syria
177	Hakimi, Mohammad ⁴²¹		Syria
178	Hosseini, Seyyed Zia ⁴²²		Syria

Table 3: Shiite Pakistani nationals of the Zeinabiyoun Brigade of the IRGC-QF killed in combat in Iraq and Syria in chronological order, June 14, 2014 – November 20, 2015

	Name	Approximate date of death (on or prior to)	Place of death
1	Hossein, Javid ⁴²³	June 27, 2014	Samarra, Iraq
2	Ali, Vejihat ⁴²⁴	November 1, 2014	Samarra, Iraq
3	Heydar, Zishan ⁴²⁵	November 1, 2014	Samarra, Iraq
4	Hossein, Baqer ⁴²⁶	November 22, 2014	Syria
5	Name unknown ⁴²⁷	November 22, 2014	Syria
6	Name unknown ⁴²⁸	November 22, 2014	Syria
7	Hossein, Adel ⁴²⁹	February 6, 2015	Syria
8	Hossein, Jamil ⁴³⁰	April 11, 2015	Syria
9	Ali, Qader ⁴³¹	April 11, 2015	Syria
10	Hossein, Qabel ⁴³²	April 11, 2015	Syria
11	Hossein, Javid ⁴³³	April 11, 2015	Syria
12	Hossein, Baqer ⁴³⁴	April 11, 2015	Syria
13	Hossein, Taher ⁴³⁵	April 25, 2015	Syria
14	Hossein, Hadi ⁴³⁶	April 25, 2015	Syria
15	Darwish, Nowrouz-Ali ⁴³⁷	April 25, 2015	Syria
16	Shah, Razi ⁴³⁸	April 25, 2015	Syria
17	Ali, Shahadat ⁴³⁹	April 25, 2015	Syria
18	Name unknown ⁴⁴⁰	April 25, 2015	Syria
19	Name unknown ⁴⁴¹	April 25, 2015	Syria
20	Hossein, Sajed ⁴⁴²	May 27, 2015	Syria
21	Hassan, Seyyed ⁴⁴³	June 26, 2015	Syria
22	Hossein, Monir ⁴⁴⁴	June 26, 2015	Syria
23	Hossein, Emtiaz ⁴⁴⁵	June 26, 2015	Syria
24	Hossein, Aqid ⁴⁴⁶	June 26, 2015	Syria
25	Hossein, Momtaz ⁴⁴⁷	June 26, 2015	Syria
26	Saqi, Hassan ⁴⁴⁸	June 26, 2015	Syria
27	Khan, Sartaj ⁴⁴⁹	November 12, 2015	Syria
28	Hossein, Navid ⁴⁵⁰	November 12, 2015	Syria
29	Hossein, Seyyed Ershad ⁴⁵¹	November 12, 2015	Syria
30	Hossein, Kamel ⁴⁵²	November 28, 2015	Syria
31	Hossein, Javid ⁴⁵³	November 28, 2015	Syria
32	Ali, Mobin ⁴⁵⁴	November 28, 2015	Syria
33	Hossein, Mottahar ⁴⁵⁵	November 28, 2015	Syria
34	Hossein, Mazaher ⁴⁵⁶	November 28, 2015	Syria
35	Hossein, Shafiq ⁴⁵⁷	November 28, 2015	Syria
36	Hassan, Etezar ⁴⁵⁸	November 28, 2015	Syria

- ¹ "Sargord Pasdar-e Shahid Moharram-e Tork (Major of the Guards Martyr Moharram Tork)," *Hammihan* (Iran), accessed November 30, 2015. (<http://www.hammihan.com/post/6700001>)
- ² "Shohada-ye Irani-ye Modafe-e Haram Kojā Dafn Shodeand? (Where Are Iranian Martyred Defenders of the Shrine Buried?)," *Mashregh News* (Iran), January 31, 2014. (<http://www.mashreghnews.ir/fa/news/281267/شهادت‌اندازان‌متصا‌یر>)
- ³ "Modafe-e Haram Mojahed-e Shahid Ali Asgari-ye Taqanaki (Ali Asgari Taqanaki Holy Warrior Martyred Defender of the Shrine)," *Ghabileh-ye Montazer* (Iran), February 1, 2014. (<http://www.qm313.com/news-iarn-jahan/jahad/shohadaharam/13161>)
- ⁴ "Tashrih-e Zojat-e Shahadat-e Sardar Shateri az Zaban-e Safir-e Iran dar Lobnan (Details of the Martyrdom of Commander Shateri in the Words of Iran's Ambassador to Lebanon)," *Khabarnameh-ye Iran* (Iran), February 8, 2013. (<http://khabarnamehiran.persianblog.ir/1391/11/>)
- ⁵ "Shahid Hassan Shateri (Martyr Hassan Shateri)," *Lale Zahraie Blog* (Iran), November 27, 2013. (<http://lale-zahraie.blogfa.com/post/8>)
- ⁶ "Goftegoi ba Hamsar-e Shahid Tabatabaei-Mehr (Conversation with the Wife of Martyr Tabatabaei-Mehr)," *Kayhan* (Iran), May 12, 2013. (<http://www.magiran.com/nview.asp?ID=2727602>)
- ⁷ "Dovvomin Salgard-e Modafe-e Haram Sardar Sartip Shahid Seyyed Hamid Tabatabaei-Mehr Bargozar Shod (The Second Anniversary of Shrine Defender Brigadier General Martyr Seyyed Hamid Tabatabaei-Mehr Was Held)," *ISAAR* (Iran), February 27, 2015. (<http://isaar.ir/doc/news/fa/110081/>)
- ⁸ "Farmandeh-ye Sabagh-e Sepah-e Tehran: Shohada Eftekhar-e Nezam va Ommat-e Eslami Hastand (Former Commander of the Tehran Guards: Martyrs Are the Pride of the System and the Islamic Community of Believers)" *Islamic Republic News Agency* (Iran), May 1, 2014. (<http://www.irna.ir/fa/NewsPrint.aspx?ID=81146997>)
- ⁹ "Tashi-e Peykar-e Sevomin Shahid-e Modafe-e Harim-e Zeinabiyeh dar Marand (Funeral of the Third Martyred Defender of Zeinabiyeh in Marand)," *Mihanpost* (Iran), April 29, 2014. (<http://mihanpost.com/نمایشگاه-پیکر-سومین-شهید-مدافع-حریم-زینابیه>)
- ¹⁰ "Peykar-e Pak-e Sorvan Sevom Shahid Rouhollah Kafizadeh dar Golzar-e Shohada-ye Najafabad Be Khak Sepordeh Shod (The Pure Corpse of Third Lieutenant Martyr Rouhollah Kafizadeh Was Laid to Rest in the Park of the Martyrs of Najafabad)," *Najafabad* (Iran), May 8, 2014. (<http://news.najafabad.ir/epic-culture/368/پیکر-پاک-سورتن-سومین-شهید-در-جنگ-انگش-نجاه>)
- ¹¹ "Shahid Rouhollah Kafizadeh (Martyr Rouhollah Kafizadeh)," *Modafe-e Haram Blog* (Iran) November 20, 2015. (<http://modafeaharam.persianblog.ir/page/kafizadeh>)
- ¹² "Tashi-e Shohada-ye Modafe-e Haram," (Funeral of Martyred Defenders of the Shrine) *Shia News* (Iran), May 18, 2013. (<http://www.shia-news.com/fa/news/55805/نمایشگاه-پیکر-سومین-شهید-مدافع-حرم-زینابیه>)
- ¹³ "Asami-ye Shohada-ye Gordan-e Abolfazl-e Abbas (Names of the Martyrs of the Abolfazl Abbas Brigade)," *Army 14 Blog* (Iran), December 30, 2013. (<http://army14.blogfa.com/>)
- ¹⁴ "Shahid Seyyed Mehdi Khorasani Modafe-e Haram-e Hazrat-e Zeinab (Martyr Seyyed Mehdi Khorasani Defender of the Shrine of Her Holiness Zeinab)," *Qabileh-ye Montazer* (Iran), February 1, 2014. (<http://www.qm313.com/news-iarn-jahan/jahad/shohadaharam/13164>)
- ¹⁵ "Eftekharat-e Gordanha-ye Ma (The Pride of Our Brigades)," *Gordan Blog* (Iran) November 20, 2015. (<http://gordan-ab.blogfa.com/>)
- ¹⁶ "Pasar Shahid Mohammad Hossein Atri (Martyred Guards Mohammad Hossein Atri)," *Kheybar 90 Blog* (Iran) November 20, 2015. (<http://kheibar90.blogfa.com/post/24>)
- ¹⁷ "Shahadat-e Do Modafe-e Irani-ye Haram-e Hazrat-e Zeinab (The Martyrdom of Two Iranian Defenders of the Shrine of Her Holiness Zeinab)," *Shia News* (Iran), June 10, 2013. (<http://www.shia-news.com/fa/news/56768/نمایشگاه-پیکر-سومین-شهید-مدافع-حرم-زینابیه>)
- ¹⁸ "Eftekharat-e Gordanha-ye Ma (The Pride of Our Brigades)," *Gordan Blog* (Iran), November 20, 2015. (<http://gordan-ab.blogfa.com/>)
- ¹⁹ "Shohada-ye Irani-ye Modafe-e Haram Kojā Aramideh-and? (Where Are Iranian Defenders of the Shrine Laid to Rest?)," *Fars News Agency* (Iran), January 31, 2014. (<http://www.farsnews.com/printable.php?nn=13921110000881>)

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- ⁴⁰ "Zendeginameh-ye Shahid Mahmoud-Reza Beizaei (The Biography of Martyr Mahmoud-Reza Beizaei)," *Samen* (Iran), August 26, 2013. (<http://samen91.persianblog.ir/post/27/>)
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**STATEMENT OF MR. SCOTT MODELL, MANAGING DIRECTOR,
THE RAPIDAN GROUP**

Mr. MODELL. Chairman Royce, Ranking Member Engel, members of the committee, fellow panelists, good morning. Thank you for the opportunity to speak today.

As the Middle East continues to burn, the U.S. and its allies have numerous reasons to believe that Iran really hasn't changed all that much since President Rouhani took office in September 2013. President Rouhani was elected to rescue Iran's economy. That was his mandate, and he is on his way to achieving that. Rouhani may appear moderate next to outspoken hardliners in the IRGC, but I believe that both continue to be driven by the same revolutionary ideals that inspired the Ayatollah Khomeini to create the Islamic Republic in 1979. Rouhani has been outspoken in his disagreement with some of the methods chosen by the IRGC, but there is little that he can do, as Mr. Alfoneh has said, to stop the IRGC.

The recent unwillingness of the Obama administration to weaken the IRGC seems to me incompatible with its apparent belief that the JCPOA will strengthen moderates in Iran who favor internal reform and rapprochement with the West. I think it is worth it to look at some of the core missions of the IRGC, particularly it is Quds Force in the region, some of which are not regularly mentioned, others which were mentioned by the chairman and the ranking member.

In addition to some of the lethal activities that were suggested and the more destabilizing military activities that the IRGC engages in, they are heavily involved in covert influence, grass roots foundation building across the region, via culture, socioeconomic, political, and business organizations, and in my testimony I have given a graphic of some of the ways in which they approach the whole of government, grass roots, bottom-up approach to building influence across countries, which is sectarian driven.

The IRGC is also working very closely with Lebanese Hezbollah to build a global commercial apparatus that is designed to acquire new technologies, assist with covert action programs, create new sources of revenue, and actually add to Iran's existing threat facilitation networks. The importance of covert action to Iran's revolutionary export strategy has been clear from day one, particularly in the last 4 years.

Since May 11, there have been dozens of terrorist plots attributed to Iran, from an attempt to murder the Saudi Ambassador in the U.S., to a foiled bomb plot in Kenya, covert action continues to remain a key tool of Iranian foreign policy.

The Quds Force is engaged in various nonkinetic activities, as I said, and they will continue to play a role in its external resistance mission, whether it is front companies religious foundations, cultural centers, and so on.

Some of the ways in which IRGC is destabilizing the region have already been mentioned. I would like to point out a couple of things that are given less attention I think, and that is the IRGC is part of a sectarian repopulation strategy across the region. Few people are talking about the IRGC's leading role in Iran's strategy to alter the sectarian balance across the region, beginning in the Levant.

So when and where it can, Iran-sponsored militias are creating Shia support bases across Iraq and Syria and even getting to the point of pressuring Sunni's entire communities to relocate. It perpetuates Sunni distrust, hatred, and organized opposition to Iran, Iran-backed militias, and even Shiites.

Bahrain is mentioned also. I think it is a particular problem. The propaganda war between Manama and Tehran continues to intensify as a result of persistent messaging on the part of Iranian hardliners that Bahrain actually belongs to Iran. The recent arrest of 36 Bahraini Shiites on charges of spying for the IRGC, the 400 or so others in prison on similar charges, and the dozens of incidents over the years, almost always lead back to the IRGC.

In Saudi Arabia while President Rouhani and Foreign Minister Zarif have made some attempt at diplomatic outreach to the Saudis, the IRGC has been on a much more confrontational path, both openly and covertly. Saudi Government continues to uncover IRGC attempts to penetrate and militarize Shia communities in its oil-rich eastern province. The IRGC's Department 1000 operating out of Basrah continues to play a key role in these and other efforts against the Kingdom.

I look forward to talking about some of my policy recommendations as well. Thank you for the opportunity.

[The prepared statement of Mr. Modell follows:]

“Iran’s Islamic Revolutionary Guard Corps: Fueling Middle East Turmoil”

Prepared testimony of Scott Modell,
Managing Director, The Rapidan Group
Before the House of Representatives Committee on Foreign Affairs

December 2, 2015

Chairman Royce, Ranking Member Engel, Members of the Committee, good morning and thank you for this opportunity to testify on “Iran’s Islamic Revolutionary Guard Corps: Fueling Middle East Turmoil.” As the Middle East continues to burn, the United States and its allies have numerous evidence to suggest that Iran has not really changed all that much since President Rouhani took office in September 2013. President Rouhani was elected to rescue Iran’s beleaguered economy, which he is well on his way to achieving.

Rouhani may appear moderate next to outspoken hardliners in the IRGC, but both are driven by the same revolutionary ideals that inspired Ayatollah Khomeini to create the Islamic Republic in 1979. Rouhani may disagree with the methods chosen by the IRGC, but there is little he can do to stop it. The recent unwillingness of the Obama Administration to weaken the IRGC is incompatible with its apparent belief that the JCPOA will strengthen moderates in Iran who favor internal reform and rapprochement with the West.

What is the IRGC Qods Force?

The Qods Force, an elite branch of the Islamic Revolutionary Guard Corps, is responsible for irregular warfare and asymmetric operations. It leads subversive activities abroad ranging from non-violent cultural and business fronts to assassinations, backing political resistance organizations, and support to violent opposition groups.

What are its primary missions?

- Conduct covert action and tactical intelligence collection, with operations designed to organize, train, equip and finance Islamic movements and pro-Iran militants around the world;
- Direct and support assassinations, mainly against Western and Israeli targets;
- Conduct covert diplomacy;
- Lead the planning and forward deployment of IRGC forces as the central piece of Iran’s asymmetrical warfare doctrine;
- Engage in covert influence and spread the resistance via cultural, social, economic, political, and business entities and organizations; and
- Build a global commercial apparatus designed to acquire new technologies, assist with government covert action programs, create new sources of revenue and add to existing threat facilitation networks.

The importance of covert action to Iran's revolutionary export strategy has been very clear: Since May 2011, there have been dozens of terrorist plots implicating Iran. From an attempt to murder the Saudi ambassador to the United States to a foiled bomb plot in Kenya, Iran continues to view covert action as an important tool of foreign policy.

The Qods Force is also engaged in various non-kinetic activities that play a central role in its external resistance mission. Qods Force officers work within a remarkable array of front companies, religious foundations, cultural centers, charities and quasi-governmental organizations.

For example, the Ahlul Bayt World Assembly (ABWA) was ostensibly set up to promote Iran's revolutionary ideology overseas and to serve as a link between the Iranian clerical establishment and foreign Shia clerics. However, ABWA has also served as an effective cover for assisting with intelligence-gathering; spotting and recruiting foreign students; and moving money and materiel destined for Qods Force (and MOIS) operations. The head of ABWA, Mohammad Hassan Akhtari, is a two-time ambassador to Syria with decades of experience in the Levant dating back to the formation of Hezbollah.

He understands Iran's objectives in Syria, Iraq and Lebanon as well as anyone and effectively merges ABWA and the Qods Force wherever necessary to advance covert action programs in the region. Qods Force commanders rely on entities such as ABWA to help with information operations designed to shape local opinion in favor of Iran; to maintain contact and supply lines with Shia proxy groups; and as foreign-based units for collecting information.

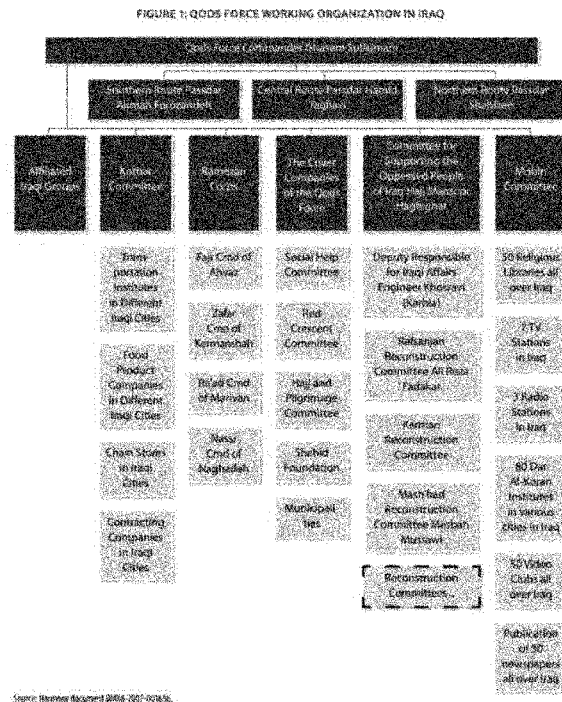
How is the IRGC destabilizing the region?

The following is just a few of the ways in which the IRGC undermines security and stability in the region:

1. Sectarian Repopulation: The active strategy that few are talking about is the IRGC's leading role in a long-term strategy to alter the sectarian balance across the region, beginning in The Levant. When and where it can, Iran-sponsored militias are creating Shia support bases across Iraq and Syria and pressuring Sunnis to relocate. It perpetuates Sunni distrust, hatred, and organized opposition to Iran-backed militias.
2. Intra-Shia Tension in Iraq: In Iraq, there are three major categories of Shia militias – those backed by Iran, those funded by Ayatollah Sistani, and others aligned with powerful Iraqi Shia politicians such as Moqtada al Sadr and Ammar al-Hakim. The lifting of sanctions in 2016 will allow Iran to increase its support to militias, cementing Iran's influence in areas far from Shia-dominant Baghdad and Basrah.
3. Foreign Fighter Pipelines: The IRGC program to identify non-Iranians to train, equip, and command in foreign conflict zones creates conflicts that would not normally exist. Iran's Qods Force recruits, trains, and deploys Afghan Shia to fight in Syria-based IRGC Qods Force units (known as the Fatemiyoun Brigades). Iran's transport of foreign fighters serves its greater mission of externalizing the Islamic Revolution, but adds fuel to a sectarian fire already raging out of control.
4. Yemen: The prospect of a nuclear Iran combined with IRGC support to Houthi rebels on its border led Saudi Arabia to take its Iran pushback strategy to the next level. The longer IRGC units provide lethal support to Houthis, the greater the chance such support escalates in unintended ways (e.g., creeping toward the Bab al-Mandeb Strait, Eastern Province, etc.).
5. Bahrain: The propaganda war between Manama and Tehran continues to intensify as a result of persistent public messaging from Iranian hardliners that Bahrain belongs to Iran. The recent arrest of 36 Bahraini Shiites on charges of spying for the IRGC, the 400 or so others in prison on similar charges, and the dozens of incidents over the years almost always lead back to the Qods Force.

6. Saudi Arabia: While President Rouhani and Foreign Minister Zarif have made some attempt at diplomatic outreach to the Saudis, the IRGC has continued on a more confrontational path, both openly and covertly. The Saudi government continues to uncover IRGC attempts to penetrate and militarize Shia communities in its oil-rich Eastern Province. Department 1000 Ramezan Corps units operating out of Basrah continue to play a key role in these and other efforts against the Kingdom.

A dated org chart of IRGC Qods Force networks in Iraq shows the degree to which its security services have emphasized the importance of a ground-up approach to gaining and maintaining influence in countries across the region:



The Response of the Obama Administration

The Administration has prioritized the JCPOA above all else, opting to cordon off the deal from Iran's destabilizing activities in the region and its repressive activities at home. The Administration has maintained terrorism and human rights-related sanctions, which have little to no bearing on Iran's economic recovery,

and offered occasional strategic reassurance to old allies in the Gulf and Israel. The White House seems to believe that by ignoring Iran's hardliners, a moderate-seeming President like Hassan Rouhani will somehow transform the Islamic Republic into a newer, nicer version that no longer adheres to the great but dangerous ambition set forth in its own revolutionary ideals.

The Impact of JCPOA Sanctions Relief on IRGC Capabilities

The destabilizing activities mentioned above continue to occur even though sanctions have not been lifted. Once sanctions are lifted, Iran will be in an even stronger position to carry out plans that have been necessarily put on hold due to budgetary shortfalls. Entire IRGC units and IRGC support to Iran's proxies, including Lebanese Hezbollah, have already started to creep back up after having plummeted due to the power of multi-lateral economic sanctions. The impact of sanctions on lost operational capability should not be underestimated. It meant less money for training, running intelligence source networks, funding local businesses, cultural centers, and other "dual use" operational infrastructure, and

Policy Recommendations

I would recommend new policies and the strengthening or better use of existing ones, as there are already tools and capacities already at our disposal for countering the IRGC. A few of them include the following:

More Sanctions on the IRGC

The IRGC is not a one-dimensional organization. Just as there are still true believers on the front lines, the IRGC also consists of jaded bureaucrats and businessmen. The latter presents several opportunities for exposing the corruption, hypocrisy, and criminal nature of the organization. The US designation of IRGC Qods Force General Gholamreza Baghbani as a Specially Designated Narcotics Trafficker pursuant to the Foreign Narcotics Kingpin Designation Act was the first use of the Kingpin Act against an Iranian official.

Recommendation: More SDN designations, sanctions, and other forms of public exposure and punishment linked to IRGC involvement in narcotics trafficking and money laundering would hurt its credibility, cut into profitable streams of revenue (that not only enrich IRGC commanders but also regional suppliers such as the Taliban), and weaken illicit networks across the region that support a wide variety of transnational organized crime.

Recommendation: Designating the entire IRGC a terrorist organization would force the regime to make some very hard choices, but it would almost certainly make it more difficult for Iran to project power across the region. It would make it easier for allied countries in the region to justify taking stronger measures against IRGC-affiliated individuals and commercial networks.

The Rewards for Justice Program

The State Department's Rewards for Justice (RFJ) Program needs to be brought into the 21st Century. Since its inception over 30 years ago, the Program has paid out ~\$125M to approximately 90 individuals. That equates to a cumulative average of 3 payouts per year – a woefully inadequate result in large part due to the Program's overly passive, tactically inflexible, and one-dimensional functionality. Several examples address these and other shortcomings. First, the Bureau of Diplomatic Security's website. It is an English-only site with a 1-800 call-in number, an address in Washington, DC, and links to RFJ-related banter on Facebook, Twitter, and YouTube that's more suitable for Western counter-terrorism analysts than jihadists.

Recommendation: Congress should mandate changes to the site based on the recommendations of intelligence and law enforcement professionals that would make it as easy and secure as possible for would-be informants to make contact with the U.S. Government. Such a panel should include those who have serviced existing US Government “write-in” web pages, such as CIA’s Virtual Walk In program. Law enforcement agencies with experience handling sources around the world, such as the Drug Enforcement Administration, should be consulted for ideas on operational exploitation perhaps, but their write-in sites are poorly administered, under-utilized, and no better than the existing RFJ website.

The RFJ website also focuses exclusively on 75 individuals who are among the “who’s who” of international terrorists. While it would be unwise to publish a more exhaustive list that could undermine ongoing counter-terrorism investigations or operations, the site should be more than a series of wanted posters and a box to write in. RFJ Program pay-outs for information on these 75 individuals should extend to underfunded and overworked foreign intelligence, military, and police units. More agile marketing of RFJ money will increase the odds of finding “liaison plus” contacts that can quietly enhance counter-terrorism cooperation with friendly or not-so-friendly liaison services.

Recommendation: Congress should consider using RFJ funds to reward those who provide actionable information on governments, companies, and individuals who are in violation of US sanctions for doing business with designated IRGC entities. One of the biggest challenges to JCPOA implementation will be how to keep tabs on Iran’s illicit nuclear procurement apparatus. To that end, Congress should ensure that RFJ funds can be used in smaller amounts to compensate those who accurately reveal JCPOA transgressions involving the IRGC, Iran’s Ministry of Intelligence and Security (MOIS), or the vast network of others who support them.

Countering the IRGC’s Business of Irregular Warfare

For the past decade or so, the US government has attempted to develop a professional cadre of law enforcement agents, civilian and military intelligence officers, analysts, and others to specialize in Counter Network Operations. The purpose was to effectively counter the financial and logistical depth and sustainment capacity of adversaries engaged in irregular or traditional warfare. Hitting the finances, financiers, and illicit networks, it was thought, would become an important means of warfare. Progress has been limited.

Key military, law enforcement, and intelligence bureaucracies must be properly oriented, educated, trained, and integrated into a government-wide effort that consists of coordinated Counter Network actions against critical IRGC infrastructure and personnel around the world. The IRGC has long relied on a networked approach to broadening Iran’s influence at home and abroad, from illicit procurement to providing lethal support to proxies across the region. We need to be better equipped to work transnationally against an enemy that continues to rely on asymmetric warfare.

We are unprepared to take full advantage of the information collected and stored by Foreign Intelligence Units (FIUs).

Recommendation: We should explore new ways of using FIUs in sustained lines of attack against cultural, business, and social bases of operations and lines of communication that make up “the business of irregular warfare.” Businesses seek to be self-supporting, self-financing, and cloaked in licit covers.

Recommendation: Congress should call on the Treasury Department to assess the current state of designated banks, investment companies, exchange houses, and other nodes of IRGC networks, the impact of US pressure over time, how designated entities have countered, and the degree to which they have been

disrupted, dismantled, or destroyed. A Treasury study should serve as the basis for recommendations for tracking and countering illicit IRGC business practices, and go hand in hand with a global Commerce Department-led effort to warn US and foreign businesses doing business in Iran. Congress should push for strengthening the operational capacity of Treasury and Commerce Department attaches. Overseas, neither is adequately staffed or funded to conduct investigations of banks, exchange houses, hawaladars, and others who will gradually return to their old ways as the taint of doing business with Iran begins to fade.

This could begin with a study to assess the current state of designated banks, investment companies, exchange houses, and other financial nodes of terrorist networks, the impact of USG pressure over time, how designated entities and individuals have countered, and the degree to which they have been disrupted, dismantled, or destroyed. It should also offer recommendations for tracking and countering illicit IRGC business practices.

Recommendation: Congress should explore options for enhancing global awareness of how IRGC illicit networks operate across the region and exposing and embarrassing the individuals, companies, and governments who abet them. This should begin with a global media campaign that spells out the risks involved in doing business with Iran and regularly offers updates on business entities that are linked to IRGC-sanctioned entities. Media efforts in the US should focus on revealing individual state investments in Iran and mandating certifications that such investments are not linked to IRGC entities still subject to human rights and terrorism-related sanctions.

Media operations could also be used to highlight Iran's failure to criminalize terrorist financing, effectively implement and act on suspicious transaction reporting, and to create a genuine Financial Intelligence Unit (FIU personnel are not authorized by law to investigate financial transactions). They could also be used to expose the hypocrisy of untaxed, unregulated, and unaudited assets worth tens of billions of dollars controlled by Iran's state-run foundations known as "bonyads" and Supreme Leader Khamenei's personal network, the Executive Committee of the Imam Khomeini's Order (EIKO). This is important because it links the shortcomings of Iran's financial system and the inability of the international community to identify and disrupt the flow of IRGC money and support to destabilizing terrorist proxies in the Middle East, South Asia, and beyond. Illicit money flows also reflect insufficient border control programs and a lack of effective multi-lateral counter terrorism initiatives with all the countries on Iran's borders.

Chairman ROYCE. Thank you. Ambassador.

STATEMENT OF MR. DANIEL BENJAMIN, NORMAN E. MCCULLOCH JR. DIRECTOR, THE JOHN SLOAN DICKEY CENTER FOR INTERNATIONAL UNDERSTANDING, DARTMOUTH COLLEGE (FORMER AMBASSADOR-AT-LARGE AND COORDINATOR FOR COUNTERTERRORISM, U.S. DEPARTMENT OF STATE)

Ambassador BENJAMIN. Chairman Royce, Ranking Member Engel, distinguished members of the committee, thank you very much for the opportunity to speak today about Iran's Revolutionary Guard Corps, and more broadly, the country's destabilizing behavior in the Middle East. As a prefatory note though, I want to mention that the United States has over recent decades compiled a record of success in dealing with Iran. We have certainly had our losses, such as at Khobar Towers in Beirut in 1983, but overall our Nation has, together with our partners in the region and around the world, prevented the Islamic Republic from causing far greater damage to regional stability and the security of some of our closest friends.

And today I am convinced that we are on a course to continue the success and, indeed, to strengthen security in the region through the JCPOA, which if Iran fulfills its obligations, will end the country's pursuit of a nuclear weapon for at least 15 years.

As President Obama has said on many occasions, this deal does not address all of Iran's behavior, nor was it intended to, but it does address one of the foremost security challenges of our time, and that is Iran's nuclear aspirations. And as we consider the other ways in which Iran challenges us, we should be mindful of the JCPOA achievement and leery of anything that would undermine it, and we should also recognize that, the problems we face would be, without the JCPOA, far more problematic if we were facing off against a nuclear-armed Iran.

The charge has been made that Iran is going to get a vast influx of cash with which to carry out terrorist attacks and subversion. We certainly have well-founded fears of Iranian plotting, and we must continue to show vigilance, but the argument I think needs to be examined in two ways. First, how likely is it that Iran will devote massive resources to such a course, and second, to what extent does the Islamic Republic's behavior, current behavior, represent a continuation of earlier conduct. It seems to me that the hypothesis is flawed in two ways—In several ways excuse me.

First, the Iranian leadership's goal in negotiating the JCPOA was to improve economic conditions at home that were eroding support for the regime. So much seems clear from the rhetoric and the behavior of Iran's leaders. It would follow, therefore, that the bulk of the money will be used to ameliorate domestic concerns. According to press reports, the U.S. intelligence community has arrived at the same conclusion. And I would add here that Iran usually makes rational calculations about advancing its interests, and having invested the time, energy, and political capital in the JCPOA, it is undoubtedly aware that a new and enhanced campaign of terrorism or subversion would risk scuttling the agreement.

Second, as has been mentioned before, the country has never restricted resources for its foreign policy, especially not for such activities as its direct support to the Assad regime and Iranian fighting in Syria. I think that suggests that it considers those areas to be well-funded. It is unlikely to spend vast new sums. It will certainly continue pouring money into those activities, but it is also important to remember that terrorism and subversion are inexpensive activities, and we have learned that through hard experience.

Iran, of course, remains by significant margin the foremost state sponsor of terrorism, and we have seen no indication that there has been any change in the belief that terrorism is a legitimate instrument of policy. But what I would like to note is that, to pick up on what Mr. Modell was saying, you know, the sectarian dimension of all this requires an awful lot of attention, and I would suggest that the situation that we confront today is far different from one that we have seen in the past. And I think it is one we really need to examine closely. Whether we are talking about what is going on in Yemen, in Bahrain, in Syria, these reflect dynamics in the region that have changed dramatically.

And it is important to recognize also that the trigger for sharpening in revival of sectarian tensions was our invasion of Iraq, which destroyed the region's fragile equilibrium and upended the regional politics. And the second trigger was the Arab Spring, which opened up a new opportunity in Syria for Sunnis to even the score having lost the capital in Baghdad.

There is a lot more to say, but I want to just close my remarks by saying that I don't think there is any expectation that Iran is going to be a good global citizen, but I think that the United States is well postured to deter and to prevent increased subversive and terrorist actions through a raft of different sanctions regimes, both as well as U.N. Security Council resolutions that enable all kinds of actions to constrain Iran, and I think that we are in a good position to manage the problems that we face. Thank you very much.

[The prepared statement of Ambassador Benjamin follows:]

The Hon. Daniel Benjamin
Director, The John Sloan Dickey Center for International Understanding
Dartmouth College
Testimony before the House Foreign Affairs Committee
Iran's Islamic Revolutionary Guard Corps: Fueling Middle East Turmoil
December 2, 2015

Chairman Royce, Ranking Member Engel, Distinguished Members of the Committee:

I want to begin by thanking you for the opportunity to speak today about Iran's Revolutionary Guard Corps and, more broadly, Iran's destabilizing behavior in the Middle East. Addressing the many forms of this behavior was a central part of my work during my work as Coordinator for Counterterrorism under Secretary Clinton and President Obama in the years 2009-2012 and, reaching even further back, to my service on President Clinton's National Security Council staff in 1998-1999.

In that earlier period, a focus of our work was assembling the case against Iran for the devastating bombing of Khobar Towers in 1996 and deterring further attacks. During my time at the State Department, I was proud of our work to strengthen the opposition to Hezbollah in Europe — an effort that involved close collaboration with Israel, and that led ultimately to the decision of the European Union to designate the group's military wing. During that period as well, I was also pleased to be part of the team of US diplomats, intelligence and law enforcement officials involved in thwarting the plot of Manssor Arbabsiar to assassinate the Saudi ambassador in Washington and turning the episode into an occasion of global condemnation of Iran for its use of terrorism as an instrument of policy. As was later demonstrated in court in the successful prosecution of Arbabsiar, that conspiracy was authorized by the IRGC. Had the plot not been detected and disrupted, the bombing would have undoubtedly cost numerous American lives. Instead, thanks to the superb teamwork within our government and the great help of the Mexican authorities, Arbabsiar was apprehended, and the United Nations General Assembly overwhelmingly passed a resolution condemning the plot by a vote of 106-9.

I mention these events because I believe it is important to recall that the United States has over the recent decades compiled a record of success in dealing with Iran. We have had our losses, such as the 19 victims of the Khobar Towers bombing, and, much earlier, the victims of the attacks against US forces in Beirut in 1983. But overall, our nation has, together with our partners in the region and around the world, prevented the Islamic Republic from causing far greater damage to regional stability and the security of some of our closest friends. Today, I am convinced that we are on a course to continue this success and, indeed, to strengthen security in the region through the Joint Comprehensive Plan of Action, which, if Iran fulfills its obligations, will end the country's pursuit of a nuclear weapon for at least 15 years. As President Obama has said on many occasions, this deal does not deal with all of Iran's behavior, but it does address all one of the foremost security problems of our time — Iran's nuclear aspirations. As we consider the other ways in which Iran challenges us, we should be mindful of the JCPOA achievement and leery of anything that would undermine it.

I also mention the foregoing events because they are good jumping off point to address the important issue of how Tehran's behavior has changed in recent years and how dramatically the regional context has been transformed. During the debate over JCPOA, the charge was often made that sanctions relief would give Iran a vast influx of cash with which to carry out terrorist attacks and subversion. Without a doubt, the United States and our allies and friends in the Middle East, from Israel to the Gulf monarchies, have well-founded fears of Iranian plotting. Under any foreseeable circumstances, we and our partners must continue to show vigilance against Iran, and as President Obama, Secretary Kerry and others have said, we no expectations that Iran will suddenly become a responsible global actor. But the argument about an impending wave of terror and subversion needs to be examined in two ways: First, how likely is it that Iran will devote massive resources to such a course? Second, to what extent does Islamic Republic's current behavior represent a continuation of earlier conduct? On the basis of the answer to these questions we can take the correct measure of the threat and respond appropriately.

Obviously, any answer to the first question will be somewhat speculative since we do not have access to the Iranian leadership's deliberations. Nonetheless, the hypothesis that Tehran will use large sums derived from sanctions relief to support terror and subversion appears flawed for two reasons. First, a primary goal of the leadership in negotiating the JCPOA was to improve economic conditions at home that were eroding support for the regime. So much seems clear from both the rhetoric and the behavior of Iran's leaders. It would follow, therefore, that the bulk of the money will be used to ameliorate domestic concerns. Press reports indicate that the US Intelligence Community has arrived at the same conclusion. I would add here that Iran usually makes rational calculations about advancing its interests, and having invested the time, energy and political capital in the JCPOA, it undoubtedly is aware that a new and enhanced campaign of terrorism would risk scuttling the agreement.

The second reason why Iran is unlikely to devote a major portion of the proceeds from sanctions relief is that the country has never restricted resources for its foreign policy — especially not for such activities as its direct support for the Assad regime and Iranian fighting forces in Syria. These costs have been significant and have stretched the Islamic Republic — though one could argue that meeting manpower needs has been a bigger challenge than the finances. Undoubtedly, Iran will be in a position to devote more funds to activities such as these, and, whether to placate disgruntled hardliners or simply to pursue policy goals, the leadership will almost certainly do so. The numbers, however, are likely to be small compared to the totals regained through sanctions relief. It is unlikely that there is an intention to spend vast new sums because these initiatives are already well funded. Terrorism, it is also worth pointing out, is inexpensive, as the United States has learned through hard experience.

Is a stepped-up campaign of terror a plausible course for Tehran given the current trends of its policy? Iran remains by a significant margin the foremost state sponsor of terror today; we have seen no indication that anything has changed the belief of Supreme Leader Khamenei or other Iranian leaders that terrorism is a legitimate instrument of policy. We should note at the outset that the United States itself is unlikely to be a target. (The Arbabsiar case remains an outstanding red herring in this history — and one of the most bizarre terrorist plots in history.) For most of the past 20 years, the Iranians have shown a healthy respect for the capabilities of US

intelligence and law enforcement to get to the bottom of any attack quickly. This has been a result of the Khobar bombing, when the FBI and the Intelligence Community demonstrated its prowess and made Iran unwilling to risk another attack and a potential reprisal. Since the 1996 attack, a small number of Americans have been caught up and killed in Iranian-backed terror attacks directed against Israelis, but specifically American targets have not been struck.

In the years that followed, Iranian terrorist activity focused primarily on support to groups targeting Israel — Hezbollah, Hamas and Palestinian Islamic Jihad — mostly in Israel itself, the West Bank and Gaza and across the border from Lebanon. The specifics of this history do not need to be repeated here. That support has been robust and continuing, though not all the groups remain recipients of Iranian funding.

Roughly five years ago, Iran and its proxy Hezbollah appeared to laying the groundwork for a renewed campaign of terrorism outside of the Middle East. There were notable arrests and disruptions in a variety of places including Thailand, Kenya, India, Azerbaijan and Cyprus. At Bulgaria's Burgas Airport in August 2012, a bomb exploded on a bus, killing seven people, including five Israeli tourists. Through some excellent forensic work, the operatives responsible were traced back to Lebanon and Hezbollah. That incident had pivotal significance in the effort to have Europe designate Hezbollah as a terrorist organization. I should add that Israel's and our success in tracking this case likely also added another measure of deterrence against Iranian terror, in this case to the benefit of Israel. This campaign came as something of surprise to the United States, but it seems likely that it was timed to send a message that increased tensions and a potential US and/or Israeli military strike against Iranian nuclear facilities would have significant costs. The multiple failures of the Iranians and the Hezbollah, however, represented a setback for them, and certainly no one in Washington or Jerusalem was in any way intimidated.

There can be little doubt that the goal of striking at Israel remains a central one for Tehran. One of the most worrisome developments of recent years has been the appearance of Hezbollah and IRGC forces in Syria opposite the Golan Heights. We should expect that Iran in particular will have an interest in showing that despite the strains of its engagement in Syria, it is still dedicated to the rejectionist cause and prepared to provoke Israel. (It is unlikely that this will happen across the Lebanese border, where the rules of the game are well known and any transgression would risk a larger fight against Hezbollah. The Syrian border, by contrast, was long the most stable and quiet one in the region, but the retrenchment of the Asad regime makes the future of that border an open question.) I am encouraged by the recent statement of Israeli Defense Minister Moshe Yaalon that Israeli deterrence vis-a-vis Iran in that area is working.

If we look at the rest of the region, however, it is clear that Iran's focus has changed significantly in recent years. Tehran has a long history of funding subversion around the Gulf, relying on disgruntled Shiite populations when it can. This was a particularly prominent part of Iranian policy in the period after the 1979 revolution, but it subsided to a much lower level in the 1990s and early 2000s.

Now — setting aside the Iran-Iraq War of 1980-1988, which ought to be considered as a different kind of phenomenon — Iran's engagement in one form or another in hot conflicts around the region is greater than at any previous time. This engagement is largely through the

agency of the IRGC. These conflicts have arisen out of the turmoil of the Arab Uprisings, the rise of ISIS and the turmoil in Iraq. Thus, as mentioned, Iranian forces are fighting on the ground in Syria in an effort to save the regime of Bashar al-Asad. This conflict has stretched Iranian capabilities, and, though good numbers are difficult to find, the casualties number certainly in the hundreds and possibly higher. Several high-ranking IRGC officers are among those killed. Iran has made clear in statements and actions that it considers the survival of the Assad regime a vital interest, and the need to preserve a connection to Hezbollah in Lebanon has been seen as essential for Tehran.

Elsewhere, Iran continues to arm and fund Shiite militias in Iraq, as it has done for many years. Several of these militias inflicted significant losses on US forces during the years of our deployment in Iraq. Today, they are involved principally in fighting ISIS and maintaining Iranian leverage over the government in Baghdad and strong pro-Shia influence on Iraqi politics more broadly.

In Yemen, Iran, typically through the IRGC, is arming and funding the Houthi forces that occupied Sana'a on September 2014. These forces, which had been fighting Yemen's central government for many years, are now engaged in a many-sided conflict involving the legitimate government of President Hadi, Saudi Arabia and the UAE, as well as al Qaeda in the Arabian Peninsula.

In Bahrain, Iran appears to be working to sow dissension against the Sunni monarchy by agitation among the dissatisfied Shia minority. A number of apparent plots have been thwarted there to date.

Surveying all these hotspots, it is, I believe, accurate to say that much of the Middle East is in the grip of a sectarian conflict of historic proportions. In some areas, the conflict may look more like one between Iran and Saudi Arabia, the two great regional great powers. For example, in Yemen, the central issue is not whether Twelver Shia will control the country. The Houthis, after all, are Zaydis — Shia, but in social and religious terms extremely close to their Sunni countrymen. Instead, it makes more sense to see this as an opportunity that Iran has seized to sap Saudi power by embroiling them in a civil war. A critical element of the conflict that is seldom considered is how the Houthi rebellion has been enabled by the reemergence of former Yemeni leader (and sometime US partner) Ali Abdullah Saleh, who threw military forces loyal to him behind the Houthis in order to unseat his successor President Hadi. In short, there much of what is going on in Yemen is about reversing the Arab Spring transition, and while Iran has found a way to sap rival Saudi Arabia, this does not seem like a case of massive Iranian aggrandizement. The consequences, however, have been staggering, and the humanitarian crisis in Yemen — which has gotten little attention because of Syria — is acute.

If we are to have the right policy response to the conflicts in the region, it is worth taking another moment to understand the drivers of this sectarianism. Many have characterized this as a 1400 year-old conflict, but in my view it is more useful to recognize that Sunni and Shia have coexisted relatively peacefully at many times in history, and the Saudis and Iranians had a relationship that was mostly untroubled until the Iran Revolution of 1979. Then, Ayatollah Ruhollah Khomeini and his followers toppled the shah and installed a theocratic government

unprecedented in the history of Shiism. Iran sought to expand its influence by creating terrorist organizations such as Hezbollah in Lebanon and stirring Shiite ambitions in Bahrain, Iraq and Saudi Arabia's Eastern Province.

The Saudi monarchy saw its religious leadership of the Muslim world challenged. The kingdom poured hundreds of millions of dollars into building mosques and schools, established huge organizations that propagated its puritanical brand of Sunni Islam and flooded the Muslim world with textbooks depicting Shiites as heretics and Christians and Jews as subhuman. The same poisonous springs that nourished the kingdom's sectarian counterrevolution would later help bring forth al Qaeda and its offshoots. After about 1990, sectarian tensions have subsided somewhat. After Ayatollah Khomeini's death, Iran's militancy cooled, while Saudi Arabia held an unprecedented national dialogue with the kingdom's restive Shiites in 2003.

We need to recognize that the trigger for the recrudescence of sectarian tensions was the US invasion of Iraq, which destroyed the region's fragile equilibrium and, in retrospect, upended regional politics as much as the Iranian Revolution. Most Sunnis detested Saddam Hussein, but they also hated the results of his overthrow: the empowerment of Iraq's Shiite majority and the rise of a government in Baghdad closely tied to Iran. The rise of Shia chauvinism, especially in the government of Nouri al-Maliki, deepened the antipathies.

Eventually, Sunni-Shia hostility exploded in the wake of the Arab Spring, with the most important new battlefield being Syria, which had been governed by a dictatorship dominated by the Alawites, a small sect descended from Shiite Islam. For the Saudis and many other Sunnis, the chance to rob Iran of its key Arab ally and get payback for losing Iraq to the Shiites was irresistible. That produced a brawl in which everyone has been effectively all in. Syrian President Bashar al-Assad is propped up by his Shiite allies, Hezbollah and Iran; the Gulf Sunnis and the Turks have funneled cash and weapons to his Sunni foes. Whenever one side seemed to be getting the upper hand, the other injected more money and arms into the conflict. The result has been a tragedy of profound proportions with upwards of 200,000 dead.

To appreciate just how deeply this sectarianism is shaping the Middle East, I would point to two facts: First, with the notable exception of Jordan, none of our traditional Sunni partners shows any real interest in combating ISIS and the scourge of extremism in the region. They are wholly invested in fighting what they perceive as Iranian encroachment. The Saudi/UAE campaign in Yemen — in contrast with the small number of sorties flown by those countries in Syria and Iraq — is more than ample proof. In words and deeds, the Sunnis have made it clear that the extremism that threatens us can be dealt with later.

Second, the sectarian rivalry has even impinged on Iran's network of terrorist allies. Hamas, which had been supported by Iran for decades, has been largely cut off because it refused to back Iranian policy in Syria. In this new context, it is worth noting the limited regard some of our Gulf friends show for American concerns about terrorism. It was telling, for example, that the newly ascended Saudi King Salman could not make it to Camp David for a planned summit for President Obama but recently had time to meet a delegation from Hamas. Evidently, the Saudis are determined that Hamas will now be sponsored only by Sunni powers.

My point here is that as we consider our policy toward the Middle East, we must understand the fundamental dynamics in the region. What is America's role in the sectarian conflict that has taken hold? I would submit that this issue needs serious and extended thought. The Gulf Arabs and the Iranians will continue to pour resources to their client groups, and in the case of Iran, there may be more to pour because of sanctions relief.

I believe, nonetheless, that we have our own interests as well, and keeping Iran from obtaining a nuclear weapon is a central one. So as we consider what steps we might take to curb Iranian influence, we should think hard about whether they will undermine the signal achievement of the JCPOA.

I am not suggesting in any way that Iran has become a good global citizen. To repeat what I noted earlier: fundamental assumptions regarding, for example, the use of terrorism as a policy instrument have not changed. So in closing, recognizing that much is unpredictable, I want to make a few comments on the issue of whether the United States is postured to deter and prevent increased subversive and terrorist actions by Iran.

- 1) A key requirement is that we continue to ensure that Israel has what it needs to protect itself. To that end, the Administration is also helping Israel address new and complex security threats to ensure Israel's Qualitative Military Edge (QME). Our defense establishments continue to work intimately — including to provide Israel new capabilities to detect and destroy terror tunnels before they are used to threaten Israeli civilians and to build highly effective rocket and missile defense systems to protect the Israeli people. The US is helping Israel improve its cyber-defenses. We continue to invest heavily in Iron Dome, which has been a major success story, among other counterterrorism technology. We continue to have a deep and productive intelligence relationship.
- 2) We still have important instruments for curbing Iran's support to militants. For example, we will still be able to rely on a series of other UNSCRs that levy arms embargoes against key areas of concern. Iranian arms transfers to the Houthis in Yemen, Shia militants in Iraq, and Hezbollah in Lebanon would therefore still violate UNSCRs and therefore be susceptible to interdiction.
- 3) Numerous relevant sanctions remain in place under the JCPOA. The Government of Iran (GOI) and Iranian financial institutions will remain blocked by the United States. US persons will continue to be broadly prohibited from engaging in transactions or dealings with the GOI and Iranian financial institutions. US persons, including US companies, will continue to be broadly prohibited from engaging in transactions with Iran, as well as with Iranian individuals and entities. Export controls on US-origin goods and technology will remain, as will statutory sanctions will still apply to transfers of WMD and conventional weapons. US law will continue to provide for sanctions on the transfer of lethal military equipment or advanced conventional weapons.
- 4) We are not signaling any relaxation whatsoever in our stand against terrorism. Iran will continue to be listed as a state sponsor of terrorism and be subject to all the sanctions and restrictions that designation entails — including on foreign assistance, arms sales, export of

certain sensitive technology and dual-use items, nuclear cooperation, and various financial restrictions. Many Iranians will remain on OFAC's SDN List because of their connection to terrorism, among them a significant number in the IRGC. The United States will also retain secondary sanctions authorities targeting third parties for dealings with Iranian persons on our SDN List, including those designated under our terrorism authorities. Secondary sanctions target conduct by non-U.S. persons related to sanctioned persons or activities. Other authorities will also remain in place to allow the USG to target Iran's support for terrorism. Under Executive Order 13224, approximately 50 Iranian-linked targets are retained under the JCPOA. Targets that will remain designated include Iran's Mahan Air, Bank Saderat, and the IRGC-Qods Force. This authority also remains in place against Iranian-sponsored terrorist groups such as Hizbollah.

In conclusion, let me say that I believe that the political realities of the moment are dramatically changed from those we knew before. These realities require that we think hard about our interests, and that we not be locked into reflexive positions that would undermine our interests going forward. I strongly believe the Obama Administration has struck the right balance in the negotiations on the JCPOA in terms of sanctions relief on the one hand and ensuring that we are prepared to deter and respond to possible Iranian terrorism and subversion.

I want to thank you for your time today, and I look forward to your questions.

Chairman ROYCE. Let me go to a question that I think impacted all of us back in October. October 15 you had the missile launch, the most advanced missile yet in the IRGC's inventory, and 2 months later there has still been no action in the wake of that test, which I think clearly violated United Nations Security Council Resolution 2331.

So Mr. Modell, if I could ask you here, about next steps, because given that the EU sanctions are going to be lifted against the traditional home of their ballistic missile programs, which is the IRGC Air Force at their Ghadar missile command, what are the chances that the administration will actually implement sanctions against Iran for this advancement in its ballistic missile program?

Mr. MODELL. I don't see any indications that there is a good chance that the Obama administration is going to take any punitive actions with regard to this ballistic missile launch. It was clearly in violation of U.N. Security Council Resolution 1929 and the updated resolution as you said. I think it is worth pointing out that the IRGC's aerospace force has not gotten a lot of attention when you look at the IRGC's role in externalizing this revolution throughout the region. And if you look at the development of Iran's missiles, it has been a key part of their conventional military build-up over the last 20 years, particularly since the end of the Iran-Iraq war. They believe it goes hand in hand with their idea of self-sufficiency in promoting the revolution.

And I think when you look at the pace at which they are developing new missiles, the pace at which they are trying to use precision-guided technology, not only in the missiles that you mentioned that are going into the hands of Hezbollah and Palestinians, it could be used against Israel but throughout the region, I think it is something that needs to be addressed. And I—

Chairman ROYCE. Let me change directions then, because obviously with the IRGC being the most probable economic actor in the equation there in the government in Iran, what is the risk of any company looking at reentering the Iranian market, from major Asian firms in Japan or in South Korea with U.S. exposure to small companies in eastern Germany? What is the risk of doing business with the IRGC?

Mr. MODELL. One of the things I would say, I am glad it was mentioned that companies going back, particularly the European companies going back into Iran, should be well advised to look at the fact that the IRGC is not going away, and the IRGC has deeply penetrated every corner of every industry in Iran for the most part.

And I think that one of the things that needs to be talked more about is the fact that IRGC-linked companies and businesses have already started the process of hiding their IRGC links in anticipation of trying to get into business deals with European companies and Asian companies and others who are going to be reentering Iran. There is a process underway, among IRGC individuals and entities, that are sanctioned, to ensconce themselves in companies that are clean, in business deals that are clean, so that means erasing old contracts, erasing records and business registries, and different things. So I think it is a very dangerous proposition for any company going back into Iran not knowing exactly who they are going to be dealing with.

The other issue, Mr. Chairman, that I would mention is over the last decade, you have seen a terrible problem in the growth of corruption in Iran. So if you believe that the Foreign Corrupt Practices Act should be any deterrent for companies going back in, again, Oil Minister Zanganeh 2 days ago, at the launch of a global meeting, to talk about the reemergence of the Iran's oil and gas industry, had to go out of his way to say any companies doing business with Iran who are asked to pay bribes, those contracts will be null and void. He had to go out of his way because it is a tremendous problem, and the IRGC is at the heart of that problem.

So, what I would advise companies going back into Iran, one thing, what has emerged is there are a number of data analytic firms here in DC and elsewhere that are specializing in due diligence, so the idea of enhanced, know-your-customer measures that will need to be taken for anybody going back into Iran will require outside support.

Chairman ROYCE. Let me ask Mr. Alfoneh the last question here, and that goes to the two goals that you talked about in your testimony that they are seeking in Iran.

First, they are working to keep Bashar al-Assad in power by coordinating Shi'ite militias to maintain control over western Syria. By the way, I would add to that something that Mr. Modell mentioned in his testimony, but I have been briefed on the fact that they are even bringing in militia from Hezbollah and their families into Sunni-dominated neighborhoods in Damascus and running the Sunni population out as they basically do an ethnic cleansing campaign. But that is part of it.

And secondarily, you said they are combatting secular opposition in Syria while maintaining ISIS is a worse alternative to al-Assad. Can you explain how the IRGC is accomplishing that dual mission?

Mr. ALFONEH. Yes, Mr. Chairman. If we look at the combat fatalities of the Revolutionary Guards in Syria, we see that the place of death is usually the places which have been bombed by the Russian Air Force, so in other words, the Revolutionary Guard is in practice acting at the infantry force, the ground force, of Russia. And we also know from U.S. Government sources that Russia is not bombing the Islamic State. Russia is bombing the secular opposition to Bashar al-Assad's regime, and then after Russia has bombed those specific areas, we see an influx of Revolutionary Guards members going into those areas, and also the place of death is reported in those exact areas. So unfortunately, this is a very, very cynical strategy that the Assad regime and the Revolutionary Guards are pursuing in combination.

Concerning your comment about the role of the Revolutionary Guards and the economy, Mr. Modell is absolutely right. If you look at the assets of the Revolutionary Guards on Tehran's stock exchange, it is more than \$17 billion worth of companies registered on Tehran's stock exchange that the Revolutionary Guard has purchased during the time that the government of President Ahmadinejad was privatizing these companies. So the Revolutionary Guards' claims that its front companies are private sector actors and they do not belong to the public sector. This is why they were allowed to bid for ownership of those companies, and they ac-

quired, they purchased those companies on Tehran's stock exchange.

Just to mention one example, Iran Telecommunication, which is the largest phone company in Iran, was purchased by the Revolutionary Guards in 2009 for \$7 billion. Back then in 2009, the military budget of the Revolutionary Guards on an annual basis was only \$5 billion, but they could pay for the company, the phone company, \$7 billion cash because of all the other economic activities that they have.

Chairman ROYCE. I assume that makes it easier for the IRGC to monitor citizens' communications as well. We will go to Mr. Engel.

Mr. ENGEL. Thank you. Thank you very much, and thank you for your excellent testimony. Ambassador Benjamin, I agree with you when you said that the invasion of Iraq really changed, upset the apple cart, and really in hindsight, we eliminated Iran's major adversary. Therefore, we helped unfortunately to make Iran the hegemony power in the region, and I think that is very, very true. But I couldn't disagree with you more when you say that the fact that Iran has been the leading state sponsor of terrorism when they had no money doesn't necessarily mean that now that they have money, they will continue or increase their terrorist activities. I think that logic says that if the goal of the Iranian regime, the Revolutionary Guards and the entire regime, is to sponsor terrorism to destabilize the region, now that they have money and it is not going to be a sacrifice, they are going to use it for terrorism.

When the Rial, their currency was in the toilet, when their people clamored for more freedoms or more things that they needed, Iran, the government, the regime didn't care. The regime made sure, though, that groups like Hezbollah and even Hamas, which of course is the other side of the Sunni-Shia spectrum, had enough money. So now that Iran has money and it is not going to be so painful, I think that it is very easy to imagine, and it is not imagination, that they will have more money to support more terrorism.

And finally, you had mentioned the Security Council resolutions. I don't think that Iran cares about Security Council resolutions. They had a resolution had been passed at a Security Council which demanded, I think there were six or seven or five resolutions that Iran stop spinning centrifuges, that Iran stop spinning. And one of the problems I had with the negotiations with Iran is that we didn't make a precondition of our sitting down with them and talking with them that they stop spinning. And once we didn't demand that as a prerequisite to sit down with them, you knew that in the conclusion of any agreement we had with them, the demand that they stop spinning, as the Security Council resolution said, would not be a final decision in any kind of agreement. So I think we essentially ceded that.

I just want to mention this because Members here are very thoughtful, and some voted no, and some voted yes. I voted no. I respect every Member's thoughtfulness. But I think that what really bothers me is I think that we have almost stamped the fact that the Iranian regime is going to be there for a long time to come. We have helped them. We have given them all kinds of relief, and any hope we had of regime change so the Iranian people could live in

a democracy I think, went out the window because frankly regimes that have lots of money are able to use it.

So I just wanted to point that out, and if you care to answer, I would be grateful.

Ambassador BENJAMIN. Mr. Engel, you have put a lot of issues on the table. Let me just try to answer a few of them quickly. You mentioned your skepticism about Security Council resolutions. Well, the issue is not what Iran thinks of them. It is that they empower the international community to take certain actions. And so for example, at the end of September, a weapons system from Iran to Yemen was seized on the high seas under the provisions of the relevant Security Council resolution. So the point is we can have an effect, a real material, concrete effect on Iran's ability to play the kind of role that everyone here deplores because of those instruments.

You mentioned the money issue. So I think that there is a few things to say. One is that there is basically an absorption issue. There is just not that many different things to spend the money on. They have been spending lots of money on these activities for a long time. They will pour more in. I expect to see that more resources will make their way in particular to Syria. And by the way, although we all deplore what is going on in Syria, I think it is important to remember that Iran's policy there is fundamentally a conservative one. They are trying to preserve the status quo. Trying to preserve their one important ally in the international community. And—

Mr. ENGEL. I might say—

Ambassador BENJAMIN. I am sorry?

Mr. ENGEL. I might say they are trying to preserve it, and in trying to preserve it, they are using the terrorist group Hezbollah to do the fighting and to guarantee that they can preserve it, so that is another element of support for—

Ambassador BENJAMIN. Without a doubt, and they have been funding Hezbollah for many, many years, and I don't dispute that in any way. I am just saying that, first of all, one of the main constraints has been manpower and not money, and, you know, you don't need \$50 billion to fund your terrorism or subversive activities.

I do find it hard to imagine why Iran would make a quantum leap in its provocative behavior if that would throw into doubt the future of the agreement that they worked so hard to get. I think that the Iranian leadership definitely saw that their position was eroding as a result of public discontent. And so I think that those resources will primarily, although not exclusively, go to ameliorate social conditions and to restart the economy.

I would just also point out, because several people have mentioned Hamas, that Hamas has been essentially cut off by Iran because Hamas refused to support Iran's policy toward Syria. And I think that this is an absolutely perfect illustration of how the sectarian upheaval in the region has changed the rules of the game. And we should remember that King Salman, the new king of Saudi Arabia, didn't find time to come to the United States for a meeting at Camp David with President Obama, but he did have time to entertain a Hamas delegation in the hope of bringing Hamas under

the Saudi wing. So things are in dramatic flux, and I think we need to think very hard and fast about what America's role is in the context of this sectarian conflict.

Finally, just on the issue of IRGC benefits from the deal, you know, it has gone unmentioned that there is still a raft of U.S. unilateral sanctions on IRGC, Treasury sanctions, which if we want can have secondary effects and which are levied against IRGC for terrorism, for proliferation, for human rights violations, and the like. And I do believe that actually companies around the world recognize that we have these sanctions, that we may reassert them in a stronger sense, that is in a secondary sense, and therefore they are going to be cautious about getting involved with IRGC-dominated entities. Thank you.

Mr. ENGEL. I just want to ask one quick question to anybody who would care to answer. We have seen some recent reports that have been unconfirmed that the head of the Quds Force, Soleimani, was severely injured in Syria. Have any of you heard that? Have you had any confirmation or lack of?

Mr. ALFONEH. Sir, we only have heard the rumors, but he seems to be alive, and of course the Islamic Republic propaganda machinery is trying constantly to communicate the message that Major General Soleimani is still alive, so there is no news of the contrary and certainly not proof.

Mr. ENGEL. Thank you. Thank, Mr. Chairman.

Chairman ROYCE. So we go to Ileana Ros-Lehtinen of Florida.

Ms. ROS-LEHTINEN. Thank you so much. Excellent hearing, Mr. Chairman and ranking member. As we have heard, and I agree with the chairman and the ranking member that the administration downplays concerns that Iran will use the sanctions relief it gets from the nuclear deal for its terror activities, instead of arguing that the money will be used to shore up a failing Iranian economy. But as we have heard, the IRGC is one of the major actors in the Iranian economy with a presence in nearly every sector.

It has a particularly large presence in the same sectors that the administration is arguing that sanctions relief will go to: Construction, infrastructure, energy, finance. The administration is telling only one small part of the story and that we have only scratched the surface of what we should be sanctioning, including designating the IRGC and the Quds Force as foreign terrorist organizations.

And, Mr. Alfoneh, in your written testimony, you mention your colleague Dr. Ottolenghi, who testified at our Middle East subcommittee on this IRGC issue 2 months ago, and you both argue that the administration should be reporting on the IRGC in much greater detail, including the subsidiaries of IRGC parent companies, the companies that have an IRGC controlling interest, and the exact nature of the IRGC support to Assad. How effective can our remaining sanctions be if we are not targeting the IRGC subsidiaries and commercial interests?

And for Mr. Modell, you highlighted the nonkinetic activities of the Quds Force, including its work in setting up religious organizations, foundations, cultural centers, and testified that progress on U.S. efforts to counter this irregular warfare has been very limited. And as Mr. Duncan continually points out, we have seen a lot of Iranian activity in the Western Hemisphere throughout the Middle

East to set up these types of influence, destabilization, recruitment centers, but very little effort by us in the United States to counter this.

What is Iran's strategic goal in all of this, and where has it been more active, and why have our efforts to counter Iranian influence in this arena been so ineffective? Mr. Alfoneh.

Mr. ALFONEH. Thank you. This is a very, very important point that you are raising, madam. The Revolutionary Guard, of course, is trying to hide its assets. There are so many front companies that the Revolutionary Guard is constantly creating, and, therefore, the Treasury here in the U.S. must, of course, also be extremely vigilant and be careful that they do not create companies that we are unaware of.

One of the good allies of the U.S. in this cat-and-mouse game of course is what remains of the private sector in Iran because they certainly do believe that the Revolutionary Guard is trying to make their business impossible in Iran. And they also would be willing to cooperate identifying some of those companies of the Revolutionary Guards which is constantly popping up.

And as you also pointed out, many of these activities are going to, you know, the money that flows into Iran goes back to the Revolutionary Guards because of their activities, particularly in the construction sector. Khatam al-Anbia construction headquarters of the Revolutionary Guards is the largest contractor in the entire Islamic Republic of Iran. Most of the public projects, development projects, in Iran, are handed over to the Khatam al-Anbia construction base on no-bid basis. So the private sector has no say. If they do participate in those projects, it is as subcontractors to the Revolutionary Guard.

Ms. ROS-LEHTINEN. Thank you, and I am going to interrupt you here to give a minute to Mr. Modell.

Mr. MODELL. Thank you for your question. One of the things is, when you think about the way that Iran externalizes revolution, when you think about when Iran goes into a place like Iraq or Syria or Yemen or anywhere else, there is a lot of building from the ground up. So when I mentioned religious centers, mosques, cultural centers, and so forth, I think that that is a firm belief that, like Mr. Alfoneh suggested, it is more than just about terrorism and subversion. It is about actually altering the fabric of the places where they want to have control and influence in.

So when they go and do this, it requires a lot of money. So, you know, when you think about the money that it takes to do this, one thing I would mention is a lot of people are speculating as to whether or not the Iranian Government is going to take this wind-fall that it is going to get from sanctions relief and direct it into the IRGC or the MOIS and other security elements of the government. I think, and Mr. Alfoneh might be among them, people have written about the fact that after the negotiations began in 2014, the IRGC budget went up. The Ministry of Intelligence budget went up, and this was just in anticipation of sanctions relief. This was publicly stated. This was publicly declared.

So I think if you are asking yourself how the Iranians are going to spend the money, they have already been very clear in indicating it. But again it is not—and I agree with Ambassador Ben-

jamin that it is cheap to pull off a terrorist attack or to do subterfuge, but we are talking about something that is much more transformational than that.

Ms. ROS-LEHTINEN. Thank you very much. Thank you, Mr. Chairman.

Chairman ROYCE. Thank you, Ileana. Mr. Brad Sherman of California.

Mr. SHERMAN. Thank you. Terrorism may be cheap. War is expensive. One of the things that happened, just as soon as it was clear to those observing Congress that this deal would go through, and Iran would get its hands on \$130 billion is Russia deployed sources to Syria. There was like a day between when I concluded—and I watch Congress—that this deal would be implemented and when Russia began its planning and deployment. I won't ask you gentlemen whether there is any proof that Iran is paying some or all of Russia's costs because my guess is that the Iranians don't share that information with you.

Ambassador Benjamin when you say that we are on course to continue our success, you may be out of step with what Americans are seeing and feeling about the Middle East. Mr. Alfoneh, you say that Iran is moving from a theocracy to a military dictatorship. In a real short answer, can you tell me: Is the next generation going to be run by clerics who are true scholars of Islam based in Qom, or are guys with guns going to select the next grand Ayatollah?

Mr. ALFONEH. Thank you for the fantastic question, sir. About the next generation of rulers in Iran, I think that Ayatollah Khomeini, the Supreme Leader of Iran, has committed the worst mistake any civilian politician can make, and it is that he is systematically using the Revolutionary Guards to suppress his domestic opposition. And of course what happens is that when you invite a military organization to participate and intervene in domestic politics, you cannot throw them out again because they have guns and you are a civilian and do not have.

Mr. SHERMAN. Got you. I do want to agree with some that have pointed out the dangers of the Quds Force and the Iranian regime in general. The Shi'ite alliance has killed hundreds of thousands of innocent people in Syria and killed far more Americans in Iraq, Afghanistan, and the Marines in Beirut, than ISIS has ever aspired to. The difference is that ISIS when they kill 50 people, put it on YouTube. When Iranian-paid-for barrel bombs kill 1,000 villagers in Syria, Assad has the good taste to deny it. And for that reason, we tend to be focusing on ISIS as the most dangerous enemy.

The question, I think it was Lenin asked, is what is to be done? You have convinced us that the Guard Force is a bad organization. We still have sanctions that are allowed under the nuclear agreement, tough sanctions on banks that conduct business on behalf of companies designated as a proliferator of WMD, which includes the IRGC, the Quds Force, many others. And what is often not mentioned in Section 302 that remains in force that provides for sanctions of those who engage in any significant activity with an IRGC entity.

One problem is that we are not applying this to the National Iranian Oil Company, which I think you would agree is heavily involved with the IRGC. I am going to be distributing to all members

of the committee a discussion draft of a statute aimed at the IRGC, and we now have a menu of sanctions that can be imposed against a bank or a company that does business with the IRGC. It shouldn't be a menu where maybe they just get some parsley, but rather an absolute ban on doing business in the United States which then can be lifted with specific licenses. So that a company that does any significant business with the IRGC would feel that it is going to lose all access to the U.S. market in doing business in the United States, and then it would have to go ask the administration for a license to go do this or that.

And, second, in order to avoid neglect of the statute, it would have the GAO give Congress a list of those organizations that appear or are most likely to be doing business with the IRGC or its front groups, and those companies would be sanctioned unless the President within 6 months came to Congress and said, well, we shouldn't sanction this one and we shouldn't sanction that one. So if the administration did what the last three administrations have done, and just ignore Iran's sanctions, those sanctions would go into effect.

So I look forward to working with the chairman and all the members and the ranking member on this discussion draft, and I also want to distribute it to our witnesses and ask you to comment on it for the record. I yield back.

Chairman ROYCE. And I want to thank Congressman Brad Sherman for that draft. We will circulate it to all the members of the committee. We go now to Congressman Dana Rohrabacher of California.

Mr. ROHRABACHER. Thank you very much, Mr. Chairman. This hearing sort of cements my view that we are entering into a new historic era, and the cold war is over, and now I think the post-cold war is coming to a close, and I don't know what we are going to call this new era that we are in. Perhaps history will record it as the era of Islamic terrorism or Islamic resurgence, depending on how we see what unfolds in the next few years. But we are in a different world than we were 10 and 20 and 30 years ago.

And I want to thank Chairman Royce. I want to thank Ranking Member Engel. We are facing a whole new era, and they are providing leadership so that we can understand the challenges that we face in this new era, and they both in sort of a bipartisan spirit and a spirit of getting to the facts, and I appreciate their leadership.

Let me ask some specific questions, then about—knowledge questions. How many members does the IRGC have? What are we talking about in Iran? Talking about 50,000 people? What are we talking about there?

Mr. ALFONEH. Sir, estimates are between 120 and 150,000 active members, active duty members of the Revolutionary—

Mr. ROHRABACHER. Are they armed or are just others—anybody who is in a business owned by them or are we talking about the armed people?

Mr. ALFONEH. These are the armed people, sir, in uniform.

Mr. ROHRABACHER. Okay. What is the regular army in Iran, and what is its size and how does it interact with this IRGC?

Mr. ALFONEH. The regular military is slightly larger, but its bases are alongside the international borders of Iran. And that is because of the constitution of Iran which gives a different mission to the regular military. The regular military has the mission of protecting the territorial integrity of the Islamic Republic of Iran. The mission of the Revolutionary Guards, according to the constitution, is to protect the revolution and its achievements in the abstract.

Mr. ROHRABACHER. Does the regular army get along with that? Is there any friction points there?

Mr. ALFONEH. There are many ideological political commissars, in the regular military, which is, you know, a classical military organization. It is not ideological.

Mr. ROHRABACHER. Which would then be friction—cause friction between the two.

In the IRGC, what ethnic makeup is that? We know in Iran about half the people are not Persian, but is the IRGC basically a Persian group, or do they have Kurdish people in it or Azeris, or Baluchs or Azeris or whoever? What is the makeup of—

Mr. ALFONEH. Yes, sir. We do believe that it actually reflects the ethnic composition of Iran as a whole.

Mr. ROHRABACHER. So there are Kurds who are—

Mr. ALFONEH.—yes, sir.

Mr. ROHRABACHER [continuing]. Members of that as well as—

Mr. ALFONEH. Shiite Kurds, yes.

Mr. ROHRABACHER. Okay. Now, in terms of the support of the IRGC for terrorism around the world, how many missiles, for example, we have all seen these rockets that go off and are shot by—out of the Gaza Strip into Israel, and I consider that to be a terrorist act. Anytime you shoot rockets into a country, especially if it is indiscriminately to try to just murder people, I would say that is terrorism.

How many of these terrorist rockets that are going into Israel from the Gaza Strip and elsewhere, were either manufactured or paid for by the IRGC?

Mr. MODELL. Thank you for the question. I think the vast majority if not all of them. And not only that, the next generation is actually providing them with the ability to manufacture them themselves.

Mr. ROHRABACHER. I didn't catch that last part.

Mr. MODELL. I would say the vast majority have been provided to them by Iran. They are linked to Iran, Iranian manufacturers, but what Iran's next phase of support in providing missiles to groups operating in the West Bank and in southern Lebanon is to actually give them the capacity to develop those missiles themselves.

Mr. ROHRABACHER. I see. And we might note Congressman Engel and myself, and Ed—I am not sure if Ed was with us on that trip or not, but I remember when we crawled in—you were with us, when we crawled into these tunnels that were dug. And that was—they were not just crawl spaces. These were very expensive construction projects. Are those things being paid for by the IRGC?

Mr. MODELL. You know, from years ago I can tell you that the intelligence community I think was divided on that question. But I think the Iranians were working very closely with Lebanese

Hezbollah in developing those, those tunnels. But as far as financing goes—

Mr. ROHRABACHER. These terrorists, whether they are people who are Palestinians who are conducting terrorism on Israel or these other, they don't have really a large source of money and what we are talking about when we say financing. This is a vital component to the existence of these terrorists.

One last note, Mr. Chairman, and I know my time is running out, is that we have a similar situation from what you described in China, where you have the People's Liberation Army controls and actually receives the profit from a large number of commercial operations. And if people are investing in that and those companies are making a profit, it is going to the People's Liberation Army and not to the people of China. So go ahead.

Mr. MODELL. I would just like to make one comment on that. I think you raise a very important point. And if you go back in time to the origin of Lebanese Hezbollah when Iran was—in the early 1980s when Iran was instrumental in figuring out what is the grand vision going to be for this organization, what is their mission going to be, one of the things that took years and years for them to develop was a global commercial apparatus that was composed of businesses, that was composed of a lot of things you just mentioned, that actually create independent streams of revenue that they are off the books. And Iran is doing it. Hezbollah is doing it. And Hezbollah's dependence on Iranian official funds over the years has gone down for that reason.

Mr. ROHRABACHER. Thank you.

Chairman ROYCE. Yes. You raised the point, Mr. Rohrabacher, on those tunnels and who paid for their construction. I would just make the point, myself, and Mr. Engel, and Mr. Rohrabacher, and Mr. Gregory Meeks, were in those tunnels shortly after the Gaza operation. And it was reminiscent to me, in 2006, the Iranian constructed tunnels done for Hezbollah, their engineers were involved in that. We know that from ID badges that were picked up after the 2006 second Lebanon War. I was there during that conflict. And in this particular case, not only do you have indication that Iran was involved in also the tunnels under Gaza, this particular tunnel that we were in, came up underneath a village. And the plan apparently was to capture students, because it was a school. It was an elementary school that it was under. And to pull them back into Gaza so that the IDF would have to fight house by house.

But the most important point is that after the conflict was over, the report surfaced which was in the Wall Street Journal, as I recall, in which Iran committed to rebuilding those tunnels that were closed, some 30 plus were discovered, for Hamas. Now, we understand Iran also supports, you know, the Palestinian Islamic jihad. In other words, they are not just supporting Hamas in Gaza. They have a secondary organization that they would prefer. But they are providing Hamas. The story also mentioned they committed to providing again to resupply the rockets to Hamas.

So, you know, it is an on-again/off-again depending on geopolitics in the area in terms of how much support they provide Hamas. They clearly would prefer Islamic jihad as an organization, but I think it is unquestionable that they have been involved in this en-

terprise. And, indeed, those reports regularly appear in the media. So I would just, Ambassador, point that out for posterity.

Ambassador BENJAMIN. If I may, Chairman Royce, historically there is no question that Iran was a principal sponsor of Hamas, and I believe the exclusive sponsor of Hezbollah. However, I believe the best information we have today is that Iran is not transferring any resources to Hamas now. And Hamas' budget is dependent entirely on its international fundraising efforts.

And that includes money that it receives from Qatar and from Turkey, that is to say, from the Sunni side of the equation. And it doesn't appear likely after repeated meetings between Hamas and Saudi Arabia that Iran is going to forgive Hamas, what it views as treasonous activities. So I think it is important that these distinctions be recognized.

Chairman ROYCE. Well, thank you. Hopefully they don't follow through on their commitment to rebuild those tunnels.

We will go, then, to Albio Sires from New Jersey who is next in the queue.

Mr. SIRES. Thank you, Mr. Chairman. And thank you for being here today.

You know, I have been to a number of hearings, and every time I sit here and sooner or later the comment is made that the Supreme Leader is losing support from the Iranian people.

I was just wondering, after the nuclear deal, have the Iranian people lost hope that there could be a change, or has the Supreme Leader solidified his position, and have the Revolutionary Guards solidified their positions now that they have a deal, and they are going to get all this money? Sir?

Mr. ALFONEH. Sir, it is an important point that you are making and a good question. I am not sure if I know the answer, but I will try my best. Mr. Khomeini needed someone, a technocratic type, like Mr. Rouhani to get people to vote for the regime in order to secure some degree of legitimacy for this regime. And the only reason Mr. Rouhani was elected as President of the Republic was because that he promised the Iranian public a nuclear deal with the U.S. This is why the Iranian people elected him.

However, now that he is elected and now that the nuclear deal is made, Mr. Khomeini no longer needs Mr. Rouhani. He no longer needs the technocratic elites of Iran. So I think the best test is going to be the parliamentary elections of February. Is Mr. Khomeini going to allow Mr. Rouhani and his technocratic elites of Iran to be elected into the Parliament, for example? Or is he systematically going to filter every single supporter of Mr. Rouhani among those candidates? And if he does that, and I strongly suspect it is going to happen, then we will see the rise of the Revolutionary Guards and a reaction among the Iranian public which is one of hopelessness.

So in one sense, yes. The Iranian public has lost faith twice; once during the Green Revolution of 2009 when unfortunately the administration extended a hand of friendship to the regime, to Mr. Khomeini and not to the Iranian public, and second time when a nuclear deal was made where the greatest beneficiary is the Revolutionary Guards and not the Iranian public.

Mr. MODEL. Thanks for your question. The only thing I would add to that is I think that there is somewhat of a misconception when you talk about Khomeini as being an all powerful figure in Iran. I think there is—to a certain degree he is weak in the sense that he is constantly forced to balance conflicting factions of a very, very—in fact, much more developed series of political factions than when he took over in 1989. You have a much more mature playing field that he has to balance. And he needs the IRGC just as much as the IRGC needs him.

So, you know, if Iranians ask themselves was the election of Rouhani and the JCPOA, do those give us hope or not, I think the Iranians are hopeful. If you look at polls, Iran is hopeful. But they don't equate it to a simple will Khomeini allow us to continue to have freedoms and advance or not. The Iranians recognize the complexity that Khomeini has to balance, and it is not an easy thing to do. And like Mr. Alfoneh pointed out, I think next February is going to be very critical in seeing just how much the IRGC has done to actually push back and ensure that, you know, if there is any momentum toward Rouhani, it slows down.

Mr. SIRE. Ambassador?

Ambassador BENJAMIN. Both of my colleagues have made very insightful remarks. I would just add that if there is one tried and true pattern in history, it is that the frustration of rising expectations is profoundly dangerous for rulers. And expectations have been raised dramatically in Iran. Rouhani is extremely popular. The notion that Iran is going to have an opening to the West, that the Iranian economy will get a new rush of oxygen, and that they will see greater prosperity I think is now quite clear. And so I think that the Supreme Leader, you know, has to walk a fine line if he wants to maintain his own standing while not disappointing the expectations of the Iranian people.

This brings me back to something actually that Mr. Engel said before about regime change. I think that we found over the last 30-plus years that regime change anywhere in the world is a perilous course of action. And I think that the virtues of the JCPOA have largely been underestimated in terms of creating a 15-year period, which is a significant period of time, in which those expectations can arise, flourish, and shape the course of the Iranian future. To be sure, we have to be vigilant about bad behavior, but I think this is no small achievement.

And we can't say for certain that in 15 years Iran will be a more hopeful place, but we, I think, can say with some certainty that without it we would be facing a very dire situation. And now we have given the Iranian people, you know, some reason to, shall we say, vote with their feet.

Mr. SIRE. Thank you very much. My time is up.

Chairman ROYCE. Mr. Matt Salmon.

Mr. SALMON. Thank you. In your view, and this question is to all panel members, is the administration's growing diplomatic outreach to Iran, and some might say acquiescence, particularly considering Iran's support for strife in the region, undermining U.S. credibility in the region? Start with you, Ambassador.

Ambassador BENJAMIN. Well, I think it is an interesting and important question. There is no question—there is no doubt that

among our Sunni allies our, Sunni partners, there is significant doubt about this, and they are committed to a policy, by and large, of not talking to Iran although they do themselves, and of doing everything they can to beat back what they see as the Shia tide. Having said that, it is not entirely clear to me that their perception of what is going on is accurate.

You know, the Sunnis are also culpable, it seems to me, particularly the Gulf Sunnis, for the humanitarian catastrophe that is Syria, because they have been pouring more and more resources in at every juncture to try to topple the Assad regime. And there has been very little desire to find an off ramp there. Similarly, although the, you know, the Yemen conflict is extremely complicated, what has I think been lost sight of is that one of the critical changes was that longtime strongman Ali Abdullah Saleh, which sides essentially, and tried to relitigate what happened in the Arab Spring and the election of—or the installation of President Hadi, and so this has been seen as another bit of Iranian perfidy. It is true that we don't like what they are doing with the Houthis, but this has also led, you know, to a campaign against, you know, an outside war against Yemen that has caused another humanitarian catastrophe.

So I think that the situations is very complicated. I think, you know, the Israeli Government's view was quite clear. But having said that, it is impressive how much of the Israeli defense establishment, I think, has come around to approve of the JCPOA and has been encouraged by the direction things are taking.

Mr. SALMON. Thank you. I am going to shift gears because I have a couple of other questions. I did want to get that one out there. But I have a question for you, Mr. Alfoneh, and then one for you as well, Mr. Modell, if I can just throw them both out.

First to you, you recommend that the U.S. should still pursue the dual goal of toppling Assad regime and fight ISIS at the same time. Even if we are able to topple the Assad regime, which will be increasingly difficult with the overt support of Assad by Russia and the covert support by Iran, what next? And wouldn't the most likely outcome be an Iranian or Russian puppet or a controlled puppet regime? Or perhaps even worse a fractured lawless Syria that will give ISIS a larger power base and more territory to control? Is this really the policy that is going to bring stability to the region?

And my add-on question to you, Mr. Modell, is very similar. Do you think Iran or ISIS poses the bigger threat to national security, our national security, both in the short and the long term? I would like your thoughts on that.

Mr. ALFONEH. Sir, I do believe that one of the reasons that the Alawite elites in Syria are backing Bashar al-Assad is that they have absolutely no alternative as things are right now. If they are given an alternative, if there are security guarantees that there is not going to be genocide of Alawites after the Sunnis also take part in government. And if a government like the United States is willing to give that type of guarantees to the Alawites, why should they stick with someone who has led to destruction of their own countries? I do believe that there is dissatisfaction even among Alawite elites in Syria, but they have honestly nowhere else to go.

Mr. SALMON. Mr. Modell.

Mr. MODELL. As to your question as to what presents a greater short- or long-term risk to U.S. national security between Iran and ISIS, you know, I guess it depends. I mean, you know, if you are talking about lone wolf terrorist attacks in the United States or, you know, bombings like 9/11 or the Paris attacks, obviously ISIS. But at the same time, I think if you look at the heart of what Iran is doing, okay, the ideologically driven externalization of its Islamic revolution and everything that represents, if you believe the vast majority of our allies, our current allies at least, in the Gulf and elsewhere, are never going to be okay with that. And they are going to always be opposed to that in a fundamental way, then I think as long as we have a long-term fundamental reason to stay in the Middle East, that is the bigger term of threat in terms of creating a permanent destabilizing presence in the region.

Mr. SALMON. Thank you. I yield back.

Chairman ROYCE. Mr. David Cicilline of Rhode Island.

Mr. CICILLINE. Thank you, Mr. Chairman. Thank you to our witnesses. And I think all of us, particularly after viewing your testimony and several other hearings we have had on this issue understand that we have to do everything that we can and use all of the tools available to us to keep the pressure on and really took to confront the IRGC and Iran and the region.

So my questions are first to you, Mr. Modell. You said the Obama administration has demonstrated an unwillingness to weaken the IRGC. So I am asking you what you think the administration should be doing to effectively weaken the IRGC?

Mr. MODELL. One of the things that I mention in my recommendations was the fact that the IRGC, if you want to look at one of the things that concerns the IRGC and the Supreme Leader and the conservative establishment in Iran, is that is the ongoing credibility of the IRGC. The IRGC—we have had one serious kingpin designation against the Iranians, against an IRGC general who was involved in narco trafficking with the Taliban and others. He is based in Balochistan and—

Mr. CICILLINE. I have limited time so can—

Mr. MODELL. Oh, sorry.

Mr. CICILLINE [continuing]. You just tell me, you know, what you think we should do.

Mr. MODELL. Recommendations? I think naming and shaming. I think there needs to be a campaign, a media campaign, not a covert. I think an open media influence campaign that points out all the things that the Iranian—that the IRGC, in particular, is doing to destabilize the region. I don't think we have done nearly enough of that.

Mr. CICILLINE. Okay. And with respect to the designation of the IRGC as a foreign terrorist organization, does anyone on the panel think they don't meet that definition? And if you don't, why not? And what would be the implications of that designation, particularly on Americans being held, but on any other facets of this conflict? Ambassador?

Ambassador BENJAMIN. So the designation of the IRGC as a State Department-designated foreign terrorist organization, would be at odds with the entire history of designations, first of all, in that it would be a designating a state organ, a state entity. Iran

is a state sponsor of terrorism, and as such is covered by a wide raft of different sanctions that are extremely comprehensive. And to add the IRGC to this, it seems to me, would add, practically speaking, nothing to our arsenal of tools, nothing meaningful.

And what is more is that there remains in effect a large array of Treasury designations against the IRGC as I mentioned before for terrorism, proliferation, human rights violations. We have all the instruments we need. And I think that to do something additional like this would both be unnecessary from a functional standpoint. And from a signalling standpoint, I am not sure that it is exactly what we need at precisely the moment that we want to see more—we want to see an effective implementation of the JCPOA.

Mr. CICILLINE. Well, with respect to that, Ambassador Benjamin, you said in your testimony that additional terrorism campaign or an additional terrorist campaign by Iran would scuttle the agreement, referring to the JCPOA. Why do you think that would scuttle the agreement? I don't see anything in the agreement that would, in fact, be in violation if they engage in terrorism.

But the argument was made that it is better to confront a non-nuclear Iran than a nuclear Iran, which I agree. And you said the U.S. is in a good position to deter and prevent increased terrorist activity. Through what means? What do you think would be the most effective way for the United States to do that, particularly since I don't think engaging in terrorism is a direct violation of the JCPOA.

Ambassador BENJAMIN. I think as a political matter if there were a widespread perception that Iran was using this opportunity to carry out a widespread—a massive terror campaign, I think that it would inevitably cause a reaction by Washington. I think that is just pure commonsense politics.

In terms of being able to deter, let's just break it down. And I will recap some of my testimony. So Iran has, since 1996, not carried out a terrorist attack against the United States, and has only had one major plot revealed, and that was the very, very strange Arbabsiar plot involving the desire to kill the Saudi Ambassador here in Washington.

I think that the Iranians have a healthy respect for our counter-terrorism capabilities, for our intelligence gathering, and for our law enforcement, and are unwilling to be caught and to risk the kind of global opprobrium that they experienced after the Arbabsiar plot when there was an overwhelming U.N. general assembly resolution condemning them.

I do believe that they will continue to try to provoke Israel, and I think that they will try to show that they can do two things at once and that they are still the leaders of the resistance. And I think for that reason our commitment to Israel's security has to be unwavering. We have to continue funding Iron Dome and continue the very robust support for Israeli defense, intelligence, and counterterrorism activities.

And as for how we work with our Arab partners, you know, I think that the solution, the secret of our success has been excellent intelligence. And I think that we should deepen that intelligence cooperation with these countries. But, you know, I just note that the circumstances are becoming more difficult as some of these

countries are themselves doing things that cross red lines for us, including, for example, their support of extremist groups in Syria.

And so to come back to my main theme, we are living in a different Middle East. And I think that we need to think long and hard about what America's role is in the midst of this sectarian conflict.

Mr. CICILLINE. Thank you. And my time is up. Thank you, Mr. Chairman.

Chairman ROYCE. Mr. Jeff Duncan of South Carolina.

Mr. DUNCAN. Thank you, Mr. Chairman.

Ambassador Benjamin, I want to go to your statement for just a minute which I thought was spot on in so many ways. But you say that Iran remains by a significant margin the foremost state sponsor of terror today. You go on to talk about Iranian terrorist activity focused primarily on support to groups like Hezbollah, Hamas, and Palestinian Islamic jihad. And then you say roughly 5 years ago Iran and its proxy Hezbollah appeared to be laying the groundwork for a renewed campaign of terrorism outside of the Middle East. Notable arrests in places like Thailand, Kenya, India, Azerbaijan, Cypress, Bulgaria, and that operatives responsible were traced back to Lebanon and Hezbollah.

So we are very familiar with the Iranian Hezbollah connection. So let's take a moment, and I chair the Western Hemisphere Subcommittee. Let's bring this closer to home. January 8 of this year there was an attempted bombing in Montevideo, Uruguay, that targeted the Israeli Embassy. A few days later, an Iranian diplomat Ahmed Sabatgold, 32, a political consultant of the Iranian Embassy suspected of being involved in placing the explosive device, fled the country. Wasn't expelled, but fled the country. We also know that very close to Uruguay is the tri-border region, which is heavily Lebanese Hezbollah. Lot of financial transaction and other things. You could tie that into the bombing in Buenos Aires. You could go back a long ways, but just keeping it present day, January in Uruguay.

And then we had five Syrian refugees, migrants, whatever you want to call them, who traveled on fake Israeli passports to, hello, the tri-border region where they were able to purchase, through Hezbollah, other fraudulent passports which turned out to be Greek passports. After travelling a little bit in South America, made their way to Honduras on fake Greek passports. Now, they may have been farmers, may have been students. We don't know what their plans were, but there is a connection between illicit activity in the tri-border region and Hezbollah, which is an Iranian proxy organization, tied to terrorism all over the globe, not just the ones that I mentioned in Uruguay and Argentina. And if you think about what you mentioned in your statement about, and I can't pronounce his name, but the Iranian that was implicated in the assassination attempt of October 2012—is that right—trying to come across the southern border with the help of the Mexican cartel, and lo and behold, it was a DEA agent. We got lucky. May not always get lucky.

Then you factor in the issue that General Kelly at SOUTHCOM brings up that Iran has opened 80 cultural centers in Latin America in the last, what, 15 years or less, where there is not really a large Muslim population. Okay? So we got tri-border region and

Hezbollah. We have got 80 cultural centers in Latin America. We got an attempt by a Quds Force operative to assassinate the Saudi Ambassador by coming across our southern border working with the drug cartel. We have got General Kelly pointing out the cultural centers and raising the alarm.

So I just want to hear your thoughts on how we combat Iran and the Quds force here in the Western Hemisphere knowing all of this. And am I wrong to start raising the flag about this issue? Ambassador.

Ambassador BENJAMIN. So Hezbollah has been present in many, many countries around the world since, really, the 1980s. And their presence is overwhelmingly in the Western Hemisphere and in West Africa where there are lots of Hezbollah operatives. It has been overwhelmingly about economic activity, but we still need to be very vigilant about the possibility that they may seek to get involved in violence.

The United States has close liaison relations with most of the countries in the hemisphere, and takes the responsibility to surveil these operations very, very seriously. With the exception of Venezuela, I think we have had very good cooperation from most of our partners. And of course you didn't mention Venezuela which has been a subject of concern regarding Hezbollah, in particular Iran, for many years. And I think that, you know, this is the world we live in.

I have written and said on many times that we need to continue our investments in intelligence and in law enforcement, and work with these countries to ensure that we have tabs on everyone who is doing anything, and then to prompt them when the time comes to take legal action or to expel these people. And on many occasions they have done so. I actually think that the level of Hezbollah infrastructure, and I haven't had an intelligence community assessment on this in some time, and I am no longer in the government, but I think the level of Hezbollah infrastructure is somewhat diminished from what it was in, say, the 1990s.

And we have had some really impressive successes against Hezbollah. For example, the case involving the Lebanese Canadian Bank which led to the forfeiture of I believe \$140 million in assets, including the uncovering of this large-scale operation that involved sending used cars to West Africa in which—from the Western Hemisphere where they were then sold across Africa and the profits were mingled with Hezbollah drug money, for example, and then passed on to Hezbollah in Lebanon.

So, we can't eliminate all of these bad actors everywhere at once, but I think that we have shown over time that we have a very, very capable intelligence community and our leaguettes around the world are working very, very hard, our FBI representatives, and I think that we continue this to keep the pressure on the group. Right now it is a group that is somewhat stretched by its involvement in Syria, and a group that I think wants to avoid being embroiled in an even wider conflict than the one it is. So it is, for example, being careful vis a vis Israel.

But, you know, at the State Department when I was coordinator, we kept a very close eye on this and were in touch with our colleagues around the world whenever we felt there was a need. And

I think that we can continue those policies to curb Hezbollah activity. I believe you have to go back to the bombings in Argentina to find any violent activity in this hemisphere by Hezbollah.

Mr. DUNCAN. And for your information, for the record, the State Department now doesn't take the Iranian activity, Hezbollah's activity in the Western Hemisphere much of a threat. And I have got the report that shows they did a very poor job in evaluating that. So——

Ambassador BENJAMIN. Well, I think—so I would have to go back and look at the country reports or anything that they have submitted to you. I think that it is probably justified to say that the threat level is low but that the economic activity remains a matter of concern.

Compared to the Sunni threat, compared to ISIS, compared to Al Qaeda in the Arabian Peninsula, I think that the threat from Hezbollah to Americans specifically is quite low.

Mr. DUNCAN. Okay. I am out of time. I appreciate your frankness and I yield back.

Chairman ROYCE. Thank you, Mr. Duncan.

We go now to Mr. Ted Deutch of Florida.

Mr. DEUTCH. Thank you, Mr. Chairman. Thanks to the witnesses for being here. And, Mr. Chairman, thanks for holding this hearing and giving us the opportunity to be reminded of Iran's sport for terrorism and the actions of the IRGC in particular.

And I would like to focus in on one part of the JCPOA that we have touched on briefly, but I really want to understand better. We are moving forward under this deal, and there is a long list of individuals and entities who will see sanctions relief under the JCPOA. Coming off of the sanctions coming off are nuclear proliferation sanctions.

This hearing is about Iran's support for terrorism. And we know that under existing law, individuals and entities can and should be sanctioned for their support for terrorism and for violation of human rights. So the question for all three of you is, shouldn't we, in advance of providing any sanctions relief to those individuals or entities for proliferation sanctions, shouldn't we go through all of them, determine which ones should still be sanctioned for their support for terrorism and never let them off to begin with?

Mr. ALFONEH. Sir, I think in this context we need to distinguish between U.S. sanctions and EU sanctions because what we see is that most of the—actually all, every single individual and entity owned or connected by the Revolutionary Guards, still remains sanctioned by the U.S. Government.

But when it comes to the European sanctions regime, they are going to remove actually most of the Revolutionary Guards units and personnel 8 years from the time of the implementation day. So the Europeans 8 years from now may be doing, engaging in——

Mr. DEUTCH. I understand that, Mr. Alfoneh. But I am focused on those individuals and entities who will get sanctions relief when sanctions relief is initially granted, not 8 years from now, but when they meet their nuclear related obligations. And from everything that I have read, there are—everyone will acknowledge that some of them are on that list, some may be on there and are on there dual sanctioned for proliferation and for terrorism, but there are

others who are on the list because it is easier to put them on the list for proliferation than it would have been to prove their support for terrorism.

But if we are serious about stopping Iran from supporting terrorism, have any of you looked at that list and identified the individuals and entities who support terrorism and who should not be considered for sanctions relief at all? Mr. Modell.

Mr. MODELL. Let me just say one of the recommendations I made the last time I testified which addressed this same question was, Treasury, which does a lot of great work, one of the things they either—and when asked by me directly to some people over there: Have you ever undertaken a comprehensive study to look at all the people who have been sanctioned and designated on the SDN lists, sort of where they are today, where that are now, how have they been impacted, are they still in business, how are they subverting sanctions, so forth. And the answer is, you know, they are poorly resourced. That is a different issue.

But the answer I think to your question is yes they should because a number of the people that are coming off the list, and I have seen a few that I haven't—that I am thinking of in particular were part of what is nothing short of a global trends national organized crime effort on the part of Iran. And in this case it was to circumvent sanctions and nuclear related issues. But those people were willing to commit crimes on behalf of the Iranian Government then. Now that you are taking them off the list, they are not going to stop being part of this global apparatus that is involved in illicit procurement activities.

Mr. DEUTCH. Right. And, Ambassador Benjamin, there was a statement within the past few weeks from the Supreme Leader who said—I think it was the Supreme Leader who said that any effort to re-impose sanctions will be a violation of the deal. But clearly that wouldn't be a violation of the deal. The terror related sanctions were never meant to be a part of the deal. That is what we were told throughout. That is clearly the view of this committee, of the administration. So shouldn't we be, before granting sanctions relief, shouldn't we be pushing back to disabuse anyone in Iran of the notion that lifting of sanctions for nuclear proliferation means lifting of sanctions altogether?

Ambassador BENJAMIN. Well, I think your point is well taken. I think that the administration has been doing that pretty clearly in statements by the President, Secretary Kerry, Wendy Sherman, and the like. No one has been, to my mind, delisted for terrorism activities. If anything, everyone has been reaffirming that Iran is and will remain designated as a state sponsor.

I cannot really say anything informed about the listings the Treasury has on individuals for terrorism, but I have certainly never heard that there have been people listed under proliferation because it was easier to do that than to do them for reasons of terrorism. Obviously these lists should be scrubbed regularly. There are issues of resources, but I think we just continue to repeat the message over and over again that bad behavior absolutely will not be tolerated.

Mr. DEUTCH. Right. I understand. But, Ambassador Benjamin, shouldn't we scrub that list now, before sanctions relief is granted,

to any of those individuals or entities to make sure that if someone on that list has been supporting terrorism and should be subject to sanctions that they continue to be subject to sanctions and they never come off that list?

Ambassador BENJAMIN. I think that is self-evident. I think that if you find people who are sanctionable because of terrorist activity, they should be sanctioned, and we have made it clear that we will do that. We did it before and we should do it again.

Mr. DEUTCH. And we should do it before there are sanctions relief granted. I appreciate it.

Thank you, Mr. Chairman. I yield back.

Mr. ENGEL [presiding]. We will go to Mr. McCaul.

Mr. MCCAUL. I thank the chairman.

Mr. ENGEL. That sounds nice, Mr. McCaul. We have a good chairman right now.

Mr. MCCAUL. Yes, we do.

Let me just—in 2012 the Obama administration basically admitted that the IRGC was one of the most powerful economic actors within Iran, that they own a network of front companies all over the world, essentially. And so while they claim that upon implementation day that the sanctions will still be in place on the IRGC.

Wouldn't these front companies that are owned by the IRGC benefit? And, therefore, wouldn't the IRGC benefit directly from the lifting of these sanctions? I will start with you, Mr. Alfoneh.

Mr. ALFONEH. Yes, sir. You know, to the extent that the Revolutionary Guards manages to establish new front companies, it would of course benefit, you know, by sanction evasion from the United States, but would also most directly benefit from the sanctions relief because the Iranian Government is funding the Revolutionary Guards' engagement in the economy of Iran.

Even during the Presidency of Mr. Rouhani who certainly does not seem to be a fan of the Revolutionary Guards, there seems to be more Revolutionary Guards participation in development of Iran's economy, in many public projects which have been granted to the Revolutionary Guards, and I also think that this is the miscalculation of President Rouhani. He thought that he could buy and bribe the Revolutionary Guards not to oppose a nuclear deal. But what of course what will happen now is that the Revolutionary Guards takes the money and they will oppose the nuclear deal during the implementation phase.

Mr. MCCAUL. That is interesting.

Mr. Modell? I am sorry. Let's go down the—okay. Ambassador.

Ambassador BENJAMIN. I would just point out that there is sort of this belief that we are headed into a completely binary change. And the fact is, as I think has been well demonstrated over the years, the threat of Treasury sanctions is an enormous threat and a big hammer. We have unilateral sanctions remaining on lots of IRGC entities. And I think that the likelihood that foreign investors—of course no Americans will be investing because of the retention of our sanctions.

But the likelihood that, say, European or Asian investors are going to suddenly strike deals with these entities if there is any shadow hanging over them is quite limited. Because in the end, the

U.S. is still going to be prepared to cut those companies off from credit markets, and our ability to do so is quite remarkable.

So, yes, in theory there is a danger there, and it is one we need to be vigilant about. But the Treasury has never been particularly shy about sharing information about those connections. And I expect they will be very aggressive in the future too.

Mr. MCCAUL. And maybe, Mr. Modell, I will let you comment, and I will just throw out the last question because my time is running out. And that is there has been some discussion that under the section 219 of the Immigration Nationality Act that the IRGC should qualify as a foreign terrorist organization. I think that would give complete certainty that the lifting of sanctions would not benefit the IRGC. But I would throw that out to you.

Mr. MODELL. One of things I want to mention on your front company question before was that when you look at the ability of—and this is based on my own experience, but with the experience in talking to people who are serving—U.S. Government officials serving in the region now. When they approach our allies, particularly in the Southern Gulf, and ask for cooperation on trying to dismantle front companies, try to get more cooperation in working against front companies, working closely with the financial intelligence units to learn more about how they are moving men and money and material throughout the region, a lot of walls are put up.

And I think if you are going to get serious about it, you need to go to places like the Emirates where there are hundreds and hundreds of companies that are springing up all the time that are in very few ways deterred by any sanctions that have been going on. So that is something I think needs to be addressed.

Mr. MCCAUL. That is a great point. What about the designation as a foreign terrorist organization? Would you agree that they should be?

Mr. MODELL. You know, I just think it is so intertwined. I appreciate, you know, Ambassador Benjamin's point earlier that it would go against historical precedent, but I think when you look at the way the dimensions of the IRGC and how interwoven they are with regard to a singular mission of—that happens to overlap with terrorism and a lot of the illicit activities they do around the world, I just don't know how you are going to deter them otherwise.

And I think one point that needs to be made is the Iranians have been very clear in saying, maybe not explicitly, but their main goal has always been to get rid of European sanctions. That is how it was before 2012. They were perfectly fine to live with a comprehensive trade ban. They can survive with it or without it.

So I think if you are going to get—you know, it is worth exploring that if you did do that you would have an extra deterrent for Europeans to do business with them, and that might be an extra way of prodding them to change their behavior—

Mr. MCCAUL. Mr. Alfoneh, do you have any opinion on that?

Mr. ALFONEH. My organization agrees with Mr. Modell's suggestion that the entire organization should be designated as a foreign terrorist organization. I have a slightly different approach in this regard because I would like to punish those entities of the Revolu-

tionary Guards which take part in the war in Syria. And we can document their presence in Syria.

And the difference, I think, hopefully, and both are methods, I think, you know, have their own, you know, merits, but I also believe that my approach would have the added value of starting a process and discussion hopefully within the Revolutionary Guards. So they try to understand the price that they are paying for supporting Basar al-Assad's regime and keeping on his throne of blood.

Mr. MCCAUL. And, Ambassador, I presume you would be opposed to that designation?

Ambassador BENJAMIN. Yes. I did summarize my reasons before. Again, it would be, on the one hand, a complete break with our tradition of how we do foreign terrorist organizations. We have never designated at the State Department a government organ. And I think that actually the existing sanctions under the designation of Iran as a state sponsor of terrorism, as well as the whole array of other executive order, Treasury designations and the like, are more than ample currently for—certainly for enforcement purposes. And I don't see any additional messaging purpose that would be fulfilled through this.

Mr. MCCAUL. I see my time has expired.

Chairman ROYCE. Lois Frankel of Florida.

Ms. FRANKEL. Thank you, Mr. Chair. Thank you. This has been a very interesting discussion. And I have some very, I will say, simplistic questions.

First of all, in terms of—we have been saying IRGC, and then we are talking about Iran. For the funding of Hezbollah, is it the IRGC that funds Hezbollah, or is it Iran, or is it both? How does that exchange happen?

Mr. ALFONEH. I only do my analysis, you know, in open source. So it is very difficult for me to give you a precise answer. But, you know, the way that it operates is usually indirect.

So the Iranian Government, in the old days, in the 1980s, for example, they would on the national budget tell the entire world that Iran is supporting, let's say, Islamic jihad or Hezbollah, and be so and so many millions of dollars. But then in mid-1980s there were several lawsuits against the Government of the Islamic Republic of Iran in the U.S. because there were victims and family members of victims of terrorists who could refer to the national budget of the Islamic Republic of Iran and prove that Iran is a state sponsor of terrorists.

So ever since mid-1980s, the Islamic Republic has been trying to hide the mechanisms through which they send money to Hezbollah. So we do not have open source information available for you. But some of that money is through Revolutionary Guards. Some of that money is through the office of the Supreme Leader. Some of that money is through the cultural centers. Even the construction base of the Revolutionary Guards, Khatam al-Anbia, is engaged in housing projects in Lebanon, particularly after the 2006 war. So there are multiple channels through which the Islamic Republic is funding Hezbollah.

Ms. FRANKEL. Did you want to answer? Because I have a couple other questions.

Ambassador BENJAMIN. I would just say very quickly, I think it is a kind of distinction without a difference. Hezbollah is funded because it is a national priority of the Government of Iran.

Ms. FRANKEL. Okay. So my next question really has to do with, I guess, the relativity of Hezbollah's efforts in the Middle East toward the conflict. If Hezbollah was not present in Syria, how much difference do you think that would make?

Mr. ALFONEH. Well, the Bashar regime would have collapsed because the Islamic Republic was not ready a few years ago to deploy large-scale forces of the Revolutionary Guards in Syria. Hezbollah has been doing the job of the Revolutionary Guards and seems also to have been suffering a large number of casualties.

My study of the Iranian casualties shows me that since January 2012, 201 Iranians have been killed in combat in Syria. The number for Lebanese fighters, Hezbollah fighters in Syria, in the same period of time seems to be above 1,000, possibly 1,500.

Ms. FRANKEL. So does anyone else want to take a stab at that? So let me say, if Hezbollah was removed or if—let me put it this way: If Hezbollah was not being funded by Iran, would there be more likely a collapse of the Assad regime?

Ambassador BENJAMIN. I think I would only say, and we are in a very hypothetical world here—

Ms. FRANKEL. Yes.

Ambassador BENJAMIN [continuing]. That it is kind of hard to imagine what that world would be like because Iran's interest in Syria is above all about the resupply and the connection with Hezbollah. So, you know, we would be taking the heart out of the jigsaw puzzle.

Ms. FRANKEL. No, no, the reason I guess—well, my motive for asking that question is because I think a lot of us were concerned with this Iran agreement because we saw a direct connection between Iran getting money, more money, funding Hezbollah, and creating this horrible conflict in Syria. So let me just ask another question if I could follow up. If Iran was not funding Hezbollah, what would you think would be the affect on peace in Israel?

Mr. MODELL. Again, that is a big hypothetical, but let me just—let me make a couple of comments on the Iran/Hezbollah relationship, the way I have seen it evolve, particularly since 2012. Point number one is when sanctions really started to hit, okay, entire operational units of the IRGC itself had to—their funding levels went down. Their activities, as a result, went down. And not only IRGC, but Hezbollah as well and other groups that were on the receiving end of Iranian Government funding also were put on hold.

So before the JCPOA took place and the Iranians were feeling the brunt of this pain of sanctions, their operational activity did decline, and but I would also say that Hezbollah has evolved into its own organization. It has its own identity. And to a certain extent by Hezbollah—over the last decade, if not more, Hezbollah has developed its own ways of generating revenue. They don't depend entirely on Iran as they did in the earliest years of the revolution.

Ms. FRANKEL. Okay. Well, that was really what my question was. So you are saying now that—well, what would you say percentage-wise their own funding versus relying on Iran?

Mr. ALFONEH. The open source, I cannot give you a precise estimate, madam, unfortunately.

Ms. FRANKEL. Mr. Chairman, I have one more—I think it is like—well, three of us are left here. We have had so many different meetings in the last month or 2 months or whatever, or the year, about what is going on in Syria. In your opinion, will the IRGC be okay with a transition out of Assad?

Mr. ALFONEH. The clear answer is no, madam. They have invested in the person of Bashar al-Assad. All the commanders, senior commanders, of the Revolutionary Guards have supported Bashar al-Assad personally in the Iranian press. It would be a terrible loss of face for them. But there seems to be discussions within the regime. So the President of Iran, President Rouhani, he has sent some signals which we could interpret as some degree of readiness to cooperate with someone else, you know, than Bashar al-Assad. But that is not the signals we hear from the Revolutionary Guards.

Ms. FRANKEL. Anybody else?

Ambassador BENJAMIN. I would just say that it is very hard to conceive of any Iranian acquiescence in a peace plan that involves both the removal of Assad and his non-replacement by one of his inner circle allied senior leaders, I think that that is—that is kind of a non-starter for the Iranians, even if they do come to the conclusion that the person himself does not have to stay there forever.

Ms. FRANKEL. Okay. Thank you very much. I yield back.

Chairman ROYCE. All right. Mr. Curt Clawson from Florida.

Mr. CLAWSON. Thank you, gentlemen.

Ambassador Benjamin, you have stated that the administration will still be able to rely on U.N. Security Council resolutions that levy arms embargoes against key areas of concerns such as Shia militias in Iraq, Hezbollah, and Lebanon, and in folks in—Houthis in Yemen.

Now, Iran does billions of dollars' worth of trade with the Gulf States. They do billions with Europe. No one is going to stop that unless it is us. I mean, you know, I don't know all the different lists. This list, that list, the other list, the Treasury Department. But I know everybody is doing business with everybody. And if we were serious and we really wanted to stop it, we would stop it.

Last time I checked, we were almost a third of the global GDP. Our trade deficit is \$40 billion a month. And a lot of that goes to the people that we would need to cooperate with us from Europe and from that region. And no one can survive without our financial system. No one. If we wanted to stop Iranians enriching themselves, we wouldn't be talking about lists, and we wouldn't be talking about the U.N. We would just say: Hey, anybody doing business with you-all can't do business with us. And that is going to shut your economy down. And anybody taking their money can't do business with our banks, and that would shut their financial access down.

It seems to me that this is just some sort of economic charade. I wouldn't depend on the U.N. to shut down the money into Iran. We have a third of the global GDP. Why would we go to the Security Council? If we wanted to stop these folks from getting guns to point at Israel and to point at our allies, we ought to get serious

about economic sanctions and economic leverage that we have. And it just always make me irate when we go through these lists when we just allow everyone to trade with these folks. You know we do. You know we do.

Are we ever going to get serious about stopping the trade? Because if we wanted to, we are the only folks—now, I know Russia won't, but our friends in Europe trade with them. And so do folks in the region. And we all know it. We just allow it to happen. Are you going to tell me they are not doing trade or that we couldn't stop them? What are you going to tell me here?

Ambassador BENJAMIN. Well, first of all, your points about America's economic power I think are largely on point, and it was because we exercised that economic power that we got the Iranians to the table to negotiate over their nuclear program.

What I said about the, and what I testified about the Security Council resolutions, is that they give us the authority under international law to stop certain kinds of trade. So for example, as I mentioned before, weapons from Iran designated for the Houthis in Yemen were seized on the high seas because we had the right under a Security Council resolution.

Mr. CLAWSON. But my question, Ambassador, is why would we outsource our economic leverage to someone else? We have the largest market in the world. I don't want to ask permission from somebody else to use my market access as leverage. We will only get a fraction of our leverage.

You are saying that we are making progress by using the U.N. and all these things you are talking about today. It may be a little bit, but why wouldn't we use the full force of our financial system and the full force of our market leverage with everyone that does business with Iran? Because I don't think the U.N. uses the full force of our economic leverage due to our market capacity.

Ambassador BENJAMIN. I am not sure, sir, to what end you want to use all that?

Mr. CLAWSON. To keep Israel safe and our friends from getting killed and thousands or millions of refugees. That is what I would like to use it for.

Ambassador BENJAMIN. Well, I think that history has shown that a mixture of different instruments, diplomacy, sanctions, military pressure, and the like, are the way to go. When we have tried in the past to have far-ranging secondary sanctions, we have had some success, but we also have encountered some very, very serious resentment from our allies, and it puts us in a very difficult position when we want to get other things from them as well. So the policymakers' job is to mix the instruments in a way that produces the desired effect. I think that our European friends if we suggest that we cut off all trade would say that is fine for you but not fine for us.

Mr. CLAWSON. And you know what, I would say that if they wanted to do business in our big box retailers, which they all do, they may not like it; but they will go along.

Do the other two of you all have anything to add? On what my point is? Am I off point here in any way? Am I wrong? Am I overstating the case of American power of economic leverage?

Mr. MODELL. No, I don't think you are overstating the economic leverage we have. I just think we have taken a dramatic shift to doing things in the way that Ambassador Benjamin has laid out in a multilateral sense, and we are not making——

Mr. CLAWSON. Well, it is not working. It is not working.

Mr. MODELL. Until the Europeans see that doing business with Iran is not in their interests, and we can't convince them otherwise, I don't see any way of how it is going to go otherwise.

Mr. CLAWSON. I yield back. Thank you.

Chairman ROYCE. Thank you. I thought I would return just with the panel here to a couple of news reports from April of this year. One includes a report from Israel's Security Service, publishing details of information on Hamas' preparation for war with respect to new tunnels being dug, and the Security Service said they had obtained from a Hamas fighter and tunnel digger arrested in that month, he provided a wealth of information on the terror groups' tunnel digging in the Gaza Strip, as well its methods for obtaining cash from Iran for the purpose of digging those tunnels. Iranian support, according to the report, came in the form of cash, weapons, and sophisticated electronic equipment meant to interfere with control signals for drones over the coastal enclave.

And then the second report in the Wall Street Journal, according to a senior Western intelligence official, Iran's Revolutionary Guards during the last few months have transferred tens of millions of dollars to Hamas' brigades. Intelligence reports show that the funds have been transferred on the direct orders of General Soleimani, the commander of the Revolutionary Guards elite Quds Force who also directs the annual budget to finance Hamas' military operation.

The funds, according to the intelligence reports, are being used primarily to help Hamas rebuild the network of tunnels that were destroyed during the Israeli defense forces response to rocket attacks launched by Hamas, militants from Gaza last summer. So at least one or two intelligence agencies have a different assessment. Just for the record since we had a dialogue on that, Ambassador, I raise that point again.

Ambassador BENJAMIN. I would just say that those reports, so there were signs of rapprochement. You know, Hamas was expelled from Tehran some years ago. There were signs of a rapprochement earlier this year. I believe that rapprochement didn't happen during the summer because of Hamas' extensive meetings with the Saudis. But I am relying here on open source, and I strongly recommend that you request a briefing from the CIA on the subject.

Chairman ROYCE. Well, thank you very much, Ambassador. I appreciate that. And, again, I appreciate the testimony of all of our witnesses here today. And so with that, we will stand adjourned.

[Whereupon, at 12:13 p.m., the committee was adjourned.]

A P P E N D I X

MATERIAL SUBMITTED FOR THE RECORD

FULL COMMITTEE HEARING NOTICE
COMMITTEE ON FOREIGN AFFAIRS
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, DC 20515-6128

Edward R. Royce (R-CA), Chairman

December 2, 2015

TO: MEMBERS OF THE COMMITTEE ON FOREIGN AFFAIRS

You are respectfully requested to attend an OPEN hearing of the Committee on Foreign Affairs, to be held in Room 2172 of the Rayburn House Office Building (and available live on the Committee website at <http://www.ForeignAffairs.house.gov>):

DATE: Wednesday, December 2, 2015

TIME: 10:00 a.m.

SUBJECT: Iran's Islamic Revolutionary Guard Corps: Fueling Middle East Turmoil

WITNESSES: Mr. Ali Alfoneh
Senior Fellow
Foundation for Defense of Democracies

Mr. Scott Modell
Managing Director
The Rapidan Group

Mr. Daniel Benjamin
Norman E. McCulloch Jr. Director
The John Sloan Dickey Center for International Understanding
Dartmouth College
(Former Ambassador-at-Large and Coordinator for Counterterrorism, U.S. Department of State)

By Direction of the Chairman

The Committee on Foreign Affairs seeks to make its facilities accessible to persons with disabilities. If you are in need of special accommodations, please call 202/223-5021 at least four business days in advance of the event, whenever practicable. Questions with regard to special accommodations in general (including availability of Committee materials in alternative formats and assistive listening devices) may be directed to the Committee.

COMMITTEE ON FOREIGN AFFAIRS
MINUTES OF FULL COMMITTEE HEARING

Day Wednesday Date 12/2/2015 Room 2172

Starting Time 10:10 Ending Time 12:13

Recesses 0 (____ to ____) (____ to ____) (____ to ____) (____ to ____) (____ to ____) (____ to ____)

Presiding Member(s)

Chairman Edward R. Royce

Check all of the following that apply:

Open Session ☒

Executive (closed) Session ☐

Televised ☒

Electronically Recorded (taped) ☒

Stenographic Record ☒

TITLE OF HEARING:

Iran's Islamic Revolutionary Guard Corps: Fueling Middle East Turmoil

COMMITTEE MEMBERS PRESENT:

See attached.

NON-COMMITTEE MEMBERS PRESENT:

none

HEARING WITNESSES: Same as meeting notice attached? Yes ☒ No ☐

(If "no", please list below and include title, agency, department, or organization.)

STATEMENTS FOR THE RECORD: *(List any statements submitted for the record.)*

IFR - Rep. Brad Sherman


SFR - Rep. Gerald Connolly

QFR - Rep. Chris Smith

TIME SCHEDULED TO RECONVENE _____

or

TIME ADJOURNED 12:13


Jean Marter, Director of Committee Operations

HOUSE COMMITTEE ON FOREIGN AFFAIRS

FULL COMMITTEE HEARING

<i>PRESENT</i>	<i>MEMBER</i>
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MATERIAL SUBMITTED FOR THE RECORD BY THE HONORABLE BRAD SHERMAN, A
REPRESENTATIVE IN CONGRESS FROM THE STATE OF CALIFORNIA

[DISCUSSION DRAFT]

114TH CONGRESS
1ST SESSION

H. R. _____

To provide for more effective sanctions against Iran's Revolutionary Guard Corps or any of its officials, agents, or affiliates to counter support for international terrorism and assistance to the Assad regime in Syria.

IN THE HOUSE OF REPRESENTATIVES

Mr. SHERMAN introduced the following bill; which was referred to the
Committee on _____

A BILL

To provide for more effective sanctions against Iran's Revolutionary Guard Corps or any of its officials, agents, or affiliates to counter support for international terrorism and assistance to the Assad regime in Syria.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the "Iran's Revolutionary
5 Guard Corps Sanctions Implementation and Review Act".

6 **SEC. 2. FINDINGS.**

7 **[NOTE: To be supplied.]**

1 **SEC. 3. MODIFICATION OF IMPOSITION OF SANCTIONS**
2 **WITH RESPECT TO PERSONS THAT SUPPORT**
3 **OR CONDUCT CERTAIN TRANSACTIONS WITH**
4 **IRAN'S REVOLUTIONARY GUARD CORPS OR**
5 **OTHER SANCTIONED PERSONS.**

6 (a) MODIFICATION OF IMPOSITION OF SANCTIONS.—
7 Subsection (b) of section 302 of the Iran Threat Reduc-
8 tion and Syrian Human Rights Act of 2012 (22 U.S.C.
9 8742) is amended by striking “the President—” and all
10 that follows and inserting “the President shall block and
11 prohibit all transactions in property and interests in prop-
12 erty with respect to such foreign person if such property
13 and interests in property are in the United States, come
14 within the United States, or are or come within the posses-
15 sion or control of a United States person.”.

16 (b) SPECIAL LICENSING AUTHORITY.—Such section,
17 as so amended, is further amended by striking subsection
18 (f) and inserting the following:

19 “(f) SPECIAL LICENSING AUTHORITY.—

20 “(1) IN GENERAL.—The President is author-
21 ized to issue licenses to United States persons to en-
22 gage in transactions in property and interests in
23 property with respect to a foreign person that is
24 subject to imposition of sanctions under subsection
25 (b) notwithstanding the imposition of such sanctions
26 with respect to the foreign person.

1 “(2) REGULATIONS.—Not later than 90 days
2 after the date of the enactment of this subsection,
3 the President shall issue regulations to implement
4 this subsection.”.

5 **SEC. 4. REPORT BY COMPTROLLER GENERAL OF THE**
6 **UNITED STATES.**

7 (a) IN GENERAL.—Not later than 180 days after the
8 date of the enactment of this Act, and annually thereafter,
9 the Comptroller General of the United States shall submit
10 to the President and the appropriate congressional com-
11 mittees a report—

12 (1) identifying foreign persons not currently
13 subject to sanctions under subsection (b) of section
14 302 of the Iran Threat Reduction and Syrian
15 Human Rights Act of 2012 (22 U.S.C. 8742) (as
16 amended by section 3 of this Act) for knowingly en-
17 gaging in an activity described in subsection (a)(1)
18 of such section that, within the preceding three
19 years, have been reported to have conducted trans-
20 actions or have provided material support to Iran’s
21 Revolutionary Guard Corps or any blocked entity
22 that has been designated as a front, agent, or affil-
23 iate of Iran’s Revolutionary Guard Corps, or other-
24 wise is designated on the list of specially designated
25 nationals and blocked persons maintained by the Of-

1 fice of Foreign Assets Control of the Department of
2 the Treasury with the identifier “IRGC”; and

3 (2) identifying foreign persons not currently on
4 the list of specially designated nationals and blocked
5 persons maintained by the Office of Foreign Assets
6 Control of the Department of the Treasury that,
7 within the preceding three years, are reported to be
8 under the ownership and control of Iran’s Revolu-
9 tionary Guard Corps, or are reported to be a front,
10 agent, or affiliate of Iran’s Revolutionary Guard
11 Corps, including foreign persons whose officers, offi-
12 cials, or those directing activity of the persons are
13 reportedly officers, officials, or other persons acting
14 on behalf of Iran’s Revolutionary Guard Corps or its
15 designated fronts, agents, or affiliates.

16 (b) SOURCES FOR REPORT.—The Comptroller Gen-
17 eral of the United States shall utilize any credible publica-
18 tion, database, web-based resource and any credible infor-
19 mation compiled by any government agency, non-govern-
20 mental organization, or other entity provided to or made
21 available to the Comptroller General, including informa-
22 tion from foreign persons identified in the report.

23 **SEC. 5. REVIEW, SANCTIONS, AND REPORT BY PRESIDENT.**

24 (a) REVIEW.—Not later than 180 days after the date
25 on which the report is submitted to the President and the

1 appropriate congressional committees under section 4, the
2 President shall conduct and complete a review of the for-
3 eign persons identified in the report to determine, using
4 all sources available, whether there is sufficient evidence
5 to impose sanctions against any of the foreign persons.

6 (b) SANCTIONS.—Unless the President determines
7 under subsection (a) that there is insufficient evidence to
8 impose sanctions against a foreign person identified in the
9 report submitted to the President and the appropriate con-
10 gressional committees under section 4, the President shall
11 include the foreign person on the list of specially des-
12 ignated nationals and blocked persons maintained by the
13 Office of Foreign Assets Control of the Department of the
14 Treasury, impose sanctions against the foreign persons
15 under subsection (b) of section 302 of the Iran Threat
16 Reduction and Syrian Human Rights Act of 2012 (22
17 U.S.C. 8742) (as amended by section 3 of this Act), or
18 impose sanctions against the foreign person under any
19 other provision of law, as applicable.

20 (c) REPORT.—The President shall submit to the ap-
21 propriate congressional committees a report that contains
22 the results of the review under subsection (a) and the im-
23 position of sanctions under subsection (b) (if any). The
24 report should be submitted in unclassified form, but may
25 contain a classified annex.

1 **SEC. 6. SECURITIES AND EXCHANGE FILING REQUIRE-**
2 **MENTS.**

3 (a) IN GENERAL.—Section 13(r)(1)(D) of the Securi-
4 ties Exchange Act of 1934 (15 U.S.C. 78m(r)(1)(D)) is
5 amended—

6 (1) in clause (ii), by striking “or” at the end;

7 (2) in clause (iii), by striking the period at the
8 end and inserting “; or”; and

9 (3) by adding at the end the following:

10 “(iv) any foreign person identified in
11 the most recent report of the Comptroller
12 General of the United States submitted
13 under section 4 of the Iran’s Revolutionary
14 Guard Corps Sanctions Implementation
15 and Review Act prior to the commence-
16 ment of the transaction or dealing.”.

17 (b) EFFECTIVE DATE.—The amendment made by
18 subsection (a) shall take effect with respect to reports re-
19 quired to be filed with the Securities and Exchange Com-
20 mission after the date that is 180 days after the date of
21 the enactment of this Act.

22 **SEC. 7. APPROPRIATE CONGRESSIONAL COMMITTEES DE-**
23 **FINED.**

24 In this Act, the term “appropriate congressional com-
25 mittees” means—

- 1 (1) the Committee on Foreign Affairs of the
- 2 House of Representatives; and
- 3 (2) the Committee on Foreign Relations of the
- 4 Senate.



Statement for the Record
Submitted by Mr. Connolly of Virginia

It is undeniable that Iran's Islamic Revolutionary Guard Corps (IRGC) is a source of subversion in the Middle East and that on several fronts the IRGC acts in direct contravention of the interests of the United States and our allies.

According to the State Department's 2014 Country Report on Terrorism, "Iran used the Islamic Revolutionary Guard Corps-Qods Force (IRGC-QF) to implement foreign policy goals, provide cover for intelligence operations, and create instability in the Middle East. The IRGC-QF is the regime's primary mechanism for cultivating and supporting terrorists abroad." Under Executive Order 13224, the IRGC-QF was designated by the U.S. Department of the Treasury in 2007 as a supporter of terrorism and sanctioned accordingly.

The State Department has also documented the IRGC's abuse of human rights and its suppression of political dissent within Iran. This includes the administration of a ward for political prisoners in the notorious Evin Prison where Washington Post reporter Jason Rezaian is being held.

This and previous Administrations have sanctioned individuals and entities associated with the IRGC's support for terrorism, abuse of human rights, and involvement in Iran's illicit nuclear and ballistic missile programs. In an August 19, 2015 letter to Congressman Jerrold Nadler - following the commitments made by the P5+1 in the Joint Comprehensive Plan of Action (JCPOA) - President Obama stated that going forward "no entities or individuals engaged in terrorism-related activity or the violation of human rights are immune from existing terrorism or human rights sanctions."

This commitment of continued vigilance against the IRGC is an obligation that must be upheld. Iran is propping up the murderous regime of Bashar Al-Assad, operating not just with impunity but upon invitation in Iraq, arming Hamas and Hizballah - which are U.S. designated foreign terrorist organizations, stoking tensions in the Persian Gulf, supporting the Houthis in Yemen, and detaining several Americans. This is only to name a few instances where Iran - in many instances through the IRGC - is furthering conflict, abusing human rights, and supporting terrorism in the Middle East.

The isolation of the nuclear issue in the JCPOA gives the U.S. and our international partners the latitude to address the myriad other issues we have with Iran without re-litigating the two years of negotiations that produced the JCPOA. This bifurcation of issues was done for a reason, and we must explore the ways in which it now frees our hand to suppress Iran's volatile influence in the Middle East. It is not the case that the implementation of the JCPOA and the prosecution of

the IRGC threat are mutually exclusive. In fact, the two are inextricably linked through the many ways in which the IRGC has supported Iran's illicit nuclear program.

There have been calls for the U.S. to designate the IRGC as a foreign terrorist organization (FTO). If this is to be considered, we should understand all of the ways in which such an action would be consistent with statute and precedent, and the Administration should make it clear to Congress how an FTO designation for the IRGC would further the strategic goals of the U.S. in the Middle East.

The IRGC is largely independent of Iran's regular military with its own sources of revenue and wealth accumulation for commanders. If the IRGC continues activities the U.S. finds not only objectionable, but actively undermining the security of the U.S. and our allies, the U.S. must demonstrate a willingness and competency to deprive the IRGC of its ability to spread terror and chaos across the region.

I welcome testimony from our witnesses that provides constructive proposals for countering the activities of the IRGC while preserving the nuclear agreement between Iran and our P5+1 partners. A course has been set for the Iranian nuclear program that has the full backing of the international community. However, given the litany of challenges Iran poses to U.S. policy in the Middle East, we cannot be satisfied to hang our hat on the JCPOA. Iran is a dangerous state sponsor of terror, and the U.S. must continue to demonstrate resolve and multilateral support for countering Iran in a post-JCPOA world.

Questions for the Record
Chairman Chris Smith
December 2, 2015

Iran is rated Tier 3 in the current Trafficking in Persons report, which states that “organized groups” are subjecting Iranian women and children to sex trafficking in Iran, the United Arab Emirates and Europe. Immigrants from Pakistan and Afghanistan are similarly being trafficked, though more for forced labor. Do we know how directly or indirectly the IRGC is involved in trafficking in persons in Iran and elsewhere?

The Quds Force has been an adviser to the Assad regime, which has used chemical weapons on its own people. To what extent have Iranian advisers been involved in such actions? Are the Iranians supplying chemical weapons as part of the effort to arm the Assad forces?

Given the widespread economic interests of the IRGC in Iran and its involvement in broad illegal activities, how can U.S. firms wanting to operate in Iran successfully without being complicit in illegal activity? Are there many opportunities to function outside the IRGC network?

[NOTE: No responses were received to the above questions prior to printing.]

